

Q. SDR-OM-1 Please provide a budget variance or similar report providing a comparison of actual vs. budget revenues and expenses for the preceding three calendar years and current year-to-date. Include explanations of the variances in excess of 10% or over \$1 million, whichever is less. Update as additional monthly reports become available.

A. SDR-OM-1 Refer to Attachment SDR-OM-1(a) for 2018 for a comparison of actual vs. budget operating and maintenance expense.

Refer to Attachment SDR-OM-1(b) for 2019 for a comparison of actual vs. budget operating and maintenance expenses.

Refer to Attachment SDR-OM-1(c) for 2020 for a comparison of actual vs. budget operating and maintenance expenses.

Refer to Attachment SDR-OM-1(d) for YTD January 2021 for a comparison of actual vs. budget operating and maintenance expenses.

Note: Results are GAAP based to align budget values

PECO Energy Company
Electric Distribution O&M Dollars
2018 Actual vs Budget
(in Thousands)

	2018	2018	Variance	%
	<u>Actuals</u>	<u>Planned</u>	<u>+Fav/-Unfav</u>	<u>Change</u>
Base Payroll	\$ 121,427	\$ 120,044	\$ (1,383)	-1.2%
Contracting	254,408	255,174	766	0.3%
Overtime	31,608	18,154	(13,455)	-74.1%
Incentive	15,831	13,629	(2,202)	-16.2%
Materials	20,522	19,651	(871)	-4.4%
Travel, Meals, & Entertain.	5,242	4,203	(1,038)	-24.7%
Transportation	13,454	11,768	(1,686)	-14.3%
Bad Debt	31,356	25,028	(6,327)	-25.3%
Pensions & Benefits	26,556	27,106	550	2.0%
Other, Net	51,248	49,074	(2,173)	-4.4%
Subtotal	\$ 571,652	\$ 543,832	\$ (27,819)	-5.1%
Storm Reserve	52,391	20,700	(31,691)	-153.1%
Total	\$ 624,042	\$ 564,532	\$ (59,510)	-10.5%

* Note: Results are GAAP based to align budget values

Base Payroll

Base payroll costs were higher by \$1M because actual headcount exceeded the planned amount (See SDR-OM-27) and paid time off usage was higher than planned.

Overtime

Overtime was higher by \$13M primarily due to higher than budgeted spending for managing restorations during non-storm periods, minor storm activity and distribution corrective maintenance.

Incentive

Incentive compensation was higher by \$2M because key performance indicator targets were exceeded.

Travel, Meals & Entertainment

Travel, meals and entertainment costs were higher by \$1M due to higher than budgeted corrective maintenance work.

Transportation

Transportation was higher by \$2M primarily due to a higher proportion of total transportation costs being allocated to O&M compared to planned splits between Capital and O&M.

Bad Debt

Bad debt costs were higher by \$6M primarily because of higher net charge offs and higher A/R reserve balances.

Other, net

Other spending was higher by \$2M primarily because of higher Injuries and Damages claims and higher postage expense for customer billing.

Storm Reserve

Additions to the storm reserve were higher by \$32M because of the Riley/Quinn combined winter storm beginning March 2, 2018, which resulted in \$48M of operating and maintenance costs, and winter storm Toby beginning March 20, 2018, resulting in an additional \$4M.

PECO Energy Company
Electric Distribution O&M Dollars
2019 Actual vs Budget
(in Thousands)

	2019	2019	Variance	%
	<u>Actuals</u>	<u>Planned</u>	<u>+Fav/-Unfav</u>	<u>Change</u>
Base Payroll	\$ 116,756	\$ 123,286	\$ 6,530	5.3%
Contracting	276,374	282,973	6,599	2.3%
Overtime	35,024	19,898	(15,126)	-76.0%
Incentive	15,436	13,986	(1,450)	-10.4%
Materials	22,517	19,094	(3,423)	-17.9%
Travel, Meals, & Entertain.	4,977	4,352	(626)	-14.4%
Transportation	12,256	12,993	737	5.7%
Bad Debt	29,472	25,216	(4,256)	-16.9%
Pensions & Benefits	24,859	22,517	(2,341)	-10.4%
Other, Net	51,126	44,667	(6,459)	-14.5%
Subtotal	\$ 588,796	\$ 568,982	\$ (19,815)	-3.5%
Storm Reserve	-	31,200	31,200	100.0%
Total	\$ 588,796	\$ 600,182	\$ 11,385	1.9%

* Note: Results are GAAP based to align budget values

Base Payroll

Base payroll was \$7M lower than planned because of a decrease in the proportion of Distribution System Operations support allocated to O&M as a result of the increase in Capital work related to reliability and resiliency improvements, as well as higher than planned vacancies within Electric Operations and Customer Operations.

Contracting

Contracting costs were \$7M lower than planned primarily due to the use of PECO resources (rather than contractor resources as planned) for managing restorations during non-storm periods and completion of other corrective maintenance tasks.

Overtime

Overtime was \$15M higher than planned because of higher minor storm activity compared to the planned amount and higher than planned spending for managing restorations during non-storm periods.

Incentive

Incentive compensation was \$1M higher than planned because key performance indicator targets were exceeded.

Travel, Meals and Entertainment

Travel, meals and entertainment costs were \$0.6M higher than planned primarily due to higher minor storm activity.

Bad Debt

Bad debt costs were \$4M higher than planned primarily because of higher net charge offs.

Other, net

Other costs were \$6M higher than planned primarily due to intercompany assistance provided for October 31st storm, temporary generation for Philadelphia manhole fire in July and higher Injuries and Damages claims.

Storm Reserve

There were no major storms in 2019. The planned amount of \$31M was based on the five-year average of major storm costs from 2014-2018. Minor storm costs, which exceeded planned amounts by \$28M, are included in the other categories.

PECO Energy Company
Electric Distribution O&M Dollars
2020 Actual vs Budget
(in Thousands)

	2020	2020	Variance	%
	<u>Actuals</u>	<u>Planned</u>	<u>+Fav/-Unfav</u>	<u>Change</u>
Base Payroll	\$ 116,171	\$ 120,920	\$ 4,749	3.9%
Contracting	280,886	301,485	20,598	6.8%
Overtime	36,356	17,368	(18,988)	-109.3%
Incentive	21,503	16,315	(5,188)	-31.8%
Materials	24,558	20,601	(3,957)	-19.2%
Travel, Meals, & Entertain.	2,533	4,491	1,958	43.6%
Transportation	12,862	13,288	426	3.2%
Bad Debt	36,489	29,723	(6,766)	-22.8%
Pensions & Benefits	22,500	21,478	(1,022)	-4.8%
Other, Net	58,225	43,871	(14,354)	-32.7%
Subtotal	\$ 612,084	\$ 589,540	\$ (22,543)	-3.8%
Storm Reserve	87,437	15,600	(71,837)	-460.5%
Total	\$ 699,520	\$ 605,140	\$ (94,380)	-15.6%

* Note: Results are GAAP based to align budget values

Base Payroll

Base payroll costs were \$5M lower than planned because of the cancellation of the aerial line school due to the COVID pandemic, and the timing of filling positions that were vacated throughout the year due to transfers, retirements and resignations.

Contracting/Overtime

Contracting was \$21M lower and overtime was \$19M higher primarily because of the use of PECO resources (rather than contractor resources as planned) for managing non-storm outage restorations and other distribution corrective and preventative maintenance. Contracting was also lower than planned due to the impact of pandemic restrictions on low-income program spending, and the moratorium on terminations. Overtime was also higher than planned due to increased minor storm activity.

Incentive

Incentive compensation was \$5M higher than planned because key performance indicator targets were exceeded.

Materials

Materials costs were \$4M higher than planned because of COVID supplies (PPE, cleaning supplies, sanitizer and wipes) and higher than planned minor storm activity.

Travel, Meals and Entertainment

Travel, meals and entertainment costs were lower by \$2M primarily due to travel and meals savings associated with back office employees working from home starting in March

Bad Debt

Bad debt expenses were higher by \$7M primarily due to COVID-related increases to A/R volume and risk, partially offset by fewer charge-offs. PECO incurred \$74.4M of total bad debt expense in 2020. In accordance with the secretarial letter, PECO established a regulatory asset for incremental uncollectible expense totaling \$37.9M. The remaining \$36.5M is reflected as O&M bad debt expense.

Pensions & Benefits

Pensions & Benefits were higher by \$1M primarily due to COVID-related parental care benefits for employees and higher 401k match because key performance indicator targets were exceeded.

Other, net

Other costs were higher by \$14M primarily due to higher Injuries and Damages claims.

Storm Reserve

There were two major storms in 2020, including the Derecho windstorm in June and tropical storm Isaias in August. These major storms resulted in \$87M of O&M expenses. The budget of \$16M was based an average of the previous 5 years of major storm expenses.

PECO Energy Company
Electric Distribution O&M Dollars
January 2021 YTD Actual vs Budget
(in Thousands)

	2021	2021	Variance	%
	<u>Actuals</u>	<u>Budget</u>	<u>+Fav/-Unfav</u>	<u>Change</u>
Base Payroll	\$ 9,145	\$ 9,807	\$ 663	6.8%
Contracting	22,902	24,746	1,844	7.5%
Overtime	2,500	1,749	(750)	-42.9%
Incentive	1,064	1,166	102	8.7%
Materials	1,326	1,615	290	17.9%
Travel, Meals, & Entertain.	474	281	(193)	-68.9%
Transportation	978	1,141	163	14.3%
Bad Debt	11,500	13,274	1,773	13.4%
Pensions & Benefits	1,470	1,632	161	9.9%
Other, Net	3,478	3,616	138	3.8%
Subtotal	\$ 54,837	\$ 59,027	\$ 4,190	7.1%
Storm Reserve	-	2,000	2,000	100.0%
Total	\$ 54,837	\$ 61,027	\$ 6,190	10.1%

* Note: Results are GAAP based to align budget values

Contracting

Contracting was \$2M lower because of less minor storm activity, fewer make ready requests, and smaller variances from timing of non-operational contracting and managing non-storm outage restorations.

Overtime

Overtime was \$0.8M higher due to managing non-storm outage restorations.

Materials

Materials costs were \$0.3M lower than planned because of less minor storm activity and timing of repair tool purchases.

Travel, Meals and Entertainment

Travel, meals and entertainment costs were \$0.2M higher primarily due to accommodations for crews assisting with storm recovery

Transportation

Transportation costs were \$0.2M lower due to fleet contracting and fuel costs.

Bad Debt

Bad debt expenses were lower by \$2M primarily due to A/R risk segment mix and lower billings, offset by CAP reserve increase and higher charge-offs.

Storm Reserve

There was no major storm activity in January. The budget of \$2M is based an average of the previous 5 years of major storm expenses.

Q. SDR-OM-2 Please provide a detailed breakdown of unadjusted operation and maintenance expenses for the historic and future test years either by natural expense codes, FERC accounts, or both as available. Explain any variances in excess of 10 percent or over \$1 million, whichever is less.

A. SDR-OM-2 Refer to Attachment SDR-OM-2(a) for a comparison of 2020 actual vs. 2021 budget and 2021 budget vs. 2022 budget for total Electric Distribution operation and maintenance expenses.

NOTE: Results are GAAP based to align with budget values

PECO Energy Company
Electric Distribution O&M Dollars
2020 Actual vs 2021 Budget, 2021 Budget vs 2022 Budget
(in Thousands)

	2020	2021	2022	Variance (+ Increase/- Decrease)			
	<u>Actuals</u>	<u>Planned</u>	<u>Planned</u>	<u>20 vs '21</u>	<u>% Change</u>	<u>21 vs '22</u>	<u>% Change</u>
Base Payroll	\$ 116,171	\$ 130,474	\$ 139,026	\$ 14,303	12.3%	\$ 8,552	6.6%
Contracting	280,886	312,061	321,253	31,175	11.1%	9,192	2.9%
Overtime	36,356	22,628	22,764	(13,728)	-37.8%	136	0.6%
Incentive	21,503	16,341	17,381	(5,162)	-24.0%	1,041	6.4%
Materials	24,558	24,518	21,437	(40)	-0.2%	(3,081)	-12.6%
Travel, Meals, & Entertain.	2,533	3,983	4,655	1,450	57.2%	672	16.9%
Transportation	12,862	14,272	14,680	1,410	11.0%	408	2.9%
Bad Debt	36,489	36,715	35,551	226	0.6%	(1,164)	-3.2%
Pensions & Benefits	22,500	21,545	19,767	(956)	-4.2%	(1,777)	-8.2%
Other, Net	58,225	42,009	37,994	(16,215)	-27.8%	(4,015)	-9.6%
Subtotal	\$ 612,084	\$ 624,546	\$ 634,508	\$ 12,462	2.0%	\$ 9,962	1.6%
Storm Reserve ¹	87,437	29,386	29,386	(58,050)	-66.4%	-	0.0%
Total	\$ 699,520	\$ 653,932	\$ 663,894	\$ (45,589)	-6.5%	\$ 9,962	1.5%

¹ Planned amounts based on 5-year average of major storm costs from 2016 to 2020

Base Payroll

The increase of \$14M between 2020 and 2021 is primarily driven by new hires and training costs to support the Long Term Infrastructure Improvement Plan (LTIIP) system reliability projects, open positions vacated within 2020 due to transfers, retirements and resignations (See II-D-10), the 2.5% average merit increase for hourly and management employees (See II-D-10) and the cancellation of the electric distribution line school in 2020 due to COVID restrictions. The increase between 2021 and 2022 of \$9M is primarily driven by new hires and training costs to support the LTIIP work and system reliability projects. The increase is also due to the 2.5% average merit increase for hourly and management employees.

Contracting/ Overtime

The combined increase of \$17M from 2020 to 2021 is driven by IT enhancements to operational infrastructure and data quality, implementation of an upgraded customer care and billing system and lower Customer Operations contracting/overtime in 2020 related to COVID impacts and the extended moratorium. The combined increase of \$9M from 2021 to 2022 is primarily driven by inflation.

Incentive

The decrease of \$5M from 2020 to 2021 is due to higher incentive payout in 2020 primarily due to exceeding key performance indicator targets while 2021 is budgeted at target. The increase of \$1M from 2021 to 2022 is due to increased headcount to support LTIIP work and system reliability projects.

Materials

The decrease of \$3M from 2021 to 2022 is primarily driven by lower distribution corrective maintenance materials.

Travel, Meals & Entertainment

The increase of \$1M from 2020 to 2021 is due to the impact of COVID on 2020 travel and meals. The increase of \$1M from 2021 to 2022 is due to the impact of COVID on 2021 travel and meals.

Transportation

The increase of \$1M from 2020 to 2021 is due to vehicle purchases related to increased headcount to support the LTIP filing and system reliability projects.

Bad Debt

The decrease of \$1M from 2021 to 2022 is primarily due to higher net charge offs and higher A/R balances in 2021 offset by regulatory asset treatment of COVID-driven bad debt in 2021 totaling \$10M. These figures are based on the service-termination moratorium ending on March 31, 2021.

Pension and Benefits

The decrease of \$2M from 2021 to 2022 is primarily due to the improved funding status of PECO's pension plans.

Other, Net

The decrease of \$16M from 2020 to 2021 is primarily driven by higher injuries and damages claims activity in 2020. The decrease of \$4M from 2021 to 2022 is due to lower technical services and customer operations support costs in 2022.

Storm Reserve

There were two major storms in 2020, including the Derecho windstorm in June and tropical storm Isaias in August. The 2021 budget is based on a five-year average of major storm costs from 2016 to 2020.

- Q. SDR-OM-3 Provide the future test year budgeted claim for expenses related to the Low-Income Usage Reduction Program (LIURP) with supporting calculations of the budgeted claim.
- A. SDR-OM-3 Both the future test year (2021) and the fully projected future test year (2022) budgeted claims for expenses related to the Low-Income Usage Reduction Program (LIURP) are \$5,600,000. Refer to Attachment SDR-OM-3(a) for supporting calculations.

LIURP 2021

2021 LIURP Projected Budget - Electric Audit Calculations

	Heating			Baseload		
	Qty	Avg Cost	Total	Qty	Avg Cost	Total
January	87	\$1,705	\$148,615	330	\$665	\$219,676
February	85	\$1,705	\$144,755	407	\$665	\$270,308
March	86	\$1,705	\$146,685	522	\$665	\$347,072
April	92	\$1,705	\$156,335	622	\$665	\$413,220
May	92	\$1,705	\$156,335	623	\$665	\$414,037
June	74	\$1,705	\$125,454	597	\$665	\$396,888
July	69	\$1,705	\$117,734	498	\$665	\$330,740
August	74	\$1,705	\$125,454	496	\$665	\$329,923
September	78	\$1,705	\$133,174	528	\$665	\$350,724
October	83	\$1,705	\$140,894	558	\$665	\$370,755
November	74	\$1,705	\$125,454	435	\$665	\$289,091
December	58	\$1,705	\$98,433	373	\$665	\$248,246
	950	\$1,705	\$1,619,320	5,988	\$665	\$3,980,680

\$5,600,000 Total

LIURP Annual Cost

Projected Administrative	\$608,461	11%
Anticipated Conservation	\$1,896,785	34%
Anticipated Weatherization	\$3,094,754	55%
Grand Total	\$5,600,000	

LIURP 2022

2022 LIURP Projected Budget - Electric Audit Calculations

	Heating			Baseload		
	Qty	Avg Cost	Total	Qty	Avg Cost	Total
January	87	\$1,705	\$148,615	330	\$665	\$219,676
February	85	\$1,705	\$144,755	407	\$665	\$270,308
March	86	\$1,705	\$146,685	522	\$665	\$347,072
April	92	\$1,705	\$156,335	622	\$665	\$413,220
May	92	\$1,705	\$156,335	623	\$665	\$414,037
June	74	\$1,705	\$125,454	597	\$665	\$396,888
July	69	\$1,705	\$117,734	498	\$665	\$330,740
August	74	\$1,705	\$125,454	496	\$665	\$329,923
September	78	\$1,705	\$133,174	528	\$665	\$350,724
October	83	\$1,705	\$140,894	558	\$665	\$370,755
November	74	\$1,705	\$125,454	435	\$665	\$289,091
December	58	\$1,705	\$98,433	373	\$665	\$248,246
	950	\$1,705	\$1,619,320	5,988	\$665	\$3,980,680

\$5,600,000 Total

LIURP Annual Cost

Projected Administrative	\$608,461	11%
Anticipated Conservation	\$1,896,785	34%
Anticipated Weatherization	\$3,094,754	55%
Grand Total	\$5,600,000	

Q. SDR-OM-4

Supply the following information regarding all expense claims in base rates related to the Customer Assistance Programs.

- a. Supply a detailed listing of all expenses claimed. Supply all supporting calculations and indicate in which FERC account the expense is included.
- b. Provide the supporting calculations for any foregone revenues or customers billing deficiency being claimed in this proceeding.

Supply a schedule reporting the following on a monthly basis for the most recent Customer Assistance Program (CAP):

- (1) Number of customers in the CAP.
- (2) Amount of billing deficiency.
- (3) Amount of arrearage forgiveness (if applicable).
- (4) Accumulated prior arrearages brought into the program.

A. SDR-OM-4

- a. Please see Attachment SDR-OM-4(a). PECO does not budget CAP expenses separately for Electric and Gas. Therefore, this answer has an 85% allocation to Electric; this allocation factor is used to assign administrative and general costs (A&G) between electric and gas utility services. PECO uses the 85% allocation factor in its annual PUC Universal Services Reporting Requirements.
- b.
 - (1) Please see Attachment SDR-OM-4(b)
 - (2) Please see Attachment SDR-OM-4(c)
 - (3) Please see Attachment SDR-OM-4(d). When a customer receives both electric and gas service from PECO, arrears are not separated by commodity. Therefore, these answers have an 85% allocation to Electric; this allocation factor is used to assign administrative and general costs (A&G) between electric and gas utility services. PECO uses the 85% allocation factor in its annual PUC Universal Services Reporting Requirements.

- (4) Please see Attachment SDR-OM-4(e). When a customer receives both electric and gas service from PECO, arrears are not separated by commodity. Therefore, these answers have an 85% allocation to Electric; this allocation factor is used to assign administrative and general costs (A&G) between electric and gas utility services. PECO uses the 85% allocation factor in its annual PUC Universal Services Reporting Requirements.

<u>Description</u>	<u>FERC Account</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>
Payroll	903000 / 908000	\$ 8,954	\$ 8,837	\$ 10,352	\$ 10,022	\$ 9,413
Pension/Benefits	926000	\$ 1,859	\$ 1,834	\$ 2,149	\$ 2,081	\$ 1,954
Bonus/Incentive	903000	\$ 894	\$ 882	\$ 1,033	\$ 1,001	\$ 940
CAP Primary Staff	903000 / 908000 / 926000	\$ 11,706	\$ 11,554	\$ 13,534	\$ 13,103	\$ 12,307
Postage (CAP Letter and app mailing)	903000	\$ 610	\$ 610	\$ 610	\$ 610	\$ 610
Convergent (CAP call center)	903000	\$ 201,827	\$ 204,374	\$ 231,938	\$ 234,818	\$ 243,863
Total 2021 CAP Program Estimates (O&M)	903000 / 908000 / 926000	\$ 214,143	\$ 216,538	\$ 246,083	\$ 248,531	\$ 256,780

<u>Description</u>	<u>FERC Account</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>
Payroll	903000 / 908000	\$ 9,178	\$ 9,058	\$ 10,611	\$ 9,806	\$ 10,107
Pension/Benefits	926000	\$ 1,749	\$ 1,727	\$ 2,023	\$ 1,869	\$ 1,927
Bonus/Incentive	903000	\$ 906	\$ 895	\$ 1,048	\$ 969	\$ 998
CAP Primary Staff	903000 / 908000 / 926000	\$ 11,833	\$ 11,680	\$ 13,681	\$ 12,643	\$ 13,032
Postage (CAP Letter and app mailing)	903000	\$ 625	\$ 625	\$ 625	\$ 625	\$ 625
Convergent (CAP call center)	903000	\$ 201,827	\$ 204,374	\$ 231,938	\$ 234,818	\$ 243,863
Total 2022 CAP Program Estimates (O&M)	903000 / 908000 / 926000	\$ 214,286	\$ 216,679	\$ 246,245	\$ 248,086	\$ 257,521

<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>2021 Budget</u>
\$ 9,357	\$ 8,900	\$ 9,688	\$ 9,572	\$ 9,702	\$ 9,099	\$ 8,166	\$ 112,061
\$ 1,943	\$ 1,848	\$ 2,011	\$ 1,987	\$ 2,014	\$ 1,889	\$ 1,695	\$ 23,263
\$ 934	\$ 889	\$ 967	\$ 956	\$ 969	\$ 908	\$ 815	\$ 11,188
\$ 12,234	\$ 11,636	\$ 12,666	\$ 12,515	\$ 12,685	\$ 11,896	\$ 10,676	\$ 146,512
\$ 610	\$ 610	\$ 610	\$ 610	\$ 610	\$ 610	\$ 610	\$ 7,318
\$ 220,226	\$ 222,641	\$ 241,805	\$ 250,815	\$ 233,245	\$ 203,474	\$ 163,481	\$ 2,652,509
\$ 233,070	\$ 234,888	\$ 255,081	\$ 263,940	\$ 246,540	\$ 215,980	\$ 174,767	\$ 2,806,340

<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>2022 Budget</u>
\$ 9,591	\$ 8,708	\$ 10,381	\$ 9,812	\$ 9,945	\$ 9,326	\$ 8,006	\$ 114,528
\$ 1,828	\$ 1,660	\$ 1,979	\$ 1,870	\$ 1,896	\$ 1,778	\$ 1,526	\$ 21,831
\$ 947	\$ 860	\$ 1,025	\$ 969	\$ 982	\$ 921	\$ 791	\$ 11,313
\$ 12,367	\$ 11,228	\$ 13,385	\$ 12,651	\$ 12,823	\$ 12,025	\$ 10,323	\$ 147,671
\$ 625	\$ 625	\$ 625	\$ 625	\$ 625	\$ 625	\$ 625	\$ 7,501
\$ 220,226	\$ 222,641	\$ 241,805	\$ 250,815	\$ 233,245	\$ 203,474	\$ 163,481	\$ 2,652,509
\$ 233,218	\$ 234,494	\$ 255,816	\$ 264,092	\$ 246,693	\$ 216,124	\$ 174,430	\$ 2,807,682

Budget inputs are not developed to align with specific FERC account numbers. The above figures represent an estimated FERC accounting location.

CAP Enrollment	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2021 Proj	114,344	114,344	114,344	115,468	116,615	117,051	117,636	118,094	118,349	118,726	119,246	119,693
2022 Proj	119,764	119,831	119,905	120,001	120,093	120,163	120,234	120,292	120,340	120,397	120,474	120,540

	2021	2022
Electric Revenue Shortfall Yearly Total (\$Ms)	\$ (77.8)	\$ (91.1)

Arrearage Forgiveness	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	FY
2021 Proj	\$344,671	\$316,480	\$376,381	\$406,139	\$490,925	\$511,296	\$504,402	\$431,186	\$459,131	\$433,500	\$465,263	\$401,906	\$5,141,278
2022 Proj	\$292,970	\$269,008	\$319,924	\$345,218	\$417,286	\$434,602	\$428,742	\$366,508	\$390,261	\$368,475	\$395,473	\$341,619	\$4,370,086

Accumulated Prior Arrearages	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	FY
2021 Proj	\$438,368	\$501,228	\$597,421	\$959,401	\$918,303	\$758,029	\$661,462	\$512,201	\$382,094	\$537,765	\$659,985	\$535,299	\$7,461,556
2022 Proj	\$391,243	\$447,347	\$533,198	\$856,265	\$819,585	\$676,541	\$590,356	\$457,139	\$341,019	\$479,955	\$589,037	\$477,754	\$6,659,438

Q. SDR-OM-5 Provide the following information regarding customer assistance participants.

- a. The average annual usage of CAP customers
- b. The average annual usage of budget-plus customers not selected as CAP customers.
- c. The average annual usage of non-payment troubled customers, both heating and non-heating customers.
- d. The projected revenue to be billed to CAP participants.

A. SDR-OM-5

- a. Refer to Attachment SDR-OM-5(a) for the average annual usage of all CAP customers in 2020.
- b. The term “budget plus” is not applicable to PECO’s CAP program.
- c. The average annual usage of non-payment troubled CAP customers, both heating and non-heating customers, is 7,956 kWh.

A “non-payment troubled” CAP customer is defined, for purposes of this analysis, as a customer who missed zero or one payments in 2020.

- d. Revenue to be billed to CAP participants is the difference between revenue from those customers at non-discounted tariff rates and the CAP shortfall. Non-discounted CAP revenue is included in overall forecasts of residential heating and non-heating revenues but is not broken out separately in such forecasts.

a. The average annual usage of CAP customers

SDR-OM-5(a)

PECO Energy Company

Year	Month	Electric CAP Usage	Electric CAP Customers	Usage per Customer (kWh)
2020	1	105,826,608	111,877	946
2020	2	94,505,431	112,448	840
2020	3	83,450,546	113,050	738
2020	4	73,568,397	113,358	649
2020	5	68,540,936	113,668	603
2020	6	74,150,434	114,028	650
2020	7	106,148,498	114,489	927
2020	8	117,532,986	114,645	1,025
2020	9	98,769,533	114,800	860
2020	10	67,365,797	114,729	587
2020	11	68,715,390	114,966	598
2020	12	94,007,624	115,427	814
Total		1,052,582,180	1,367,485	9,239

Q. SDR-OM-6 Supply the following information as it related to the most recent heating season (2019-2020) the information is as follows:

- a. Number of customers receiving LIHEAP grants.
- b. The total amount of all LIHEAP grants.
- c. Number of customers receiving crisis grants.
- d. The total amount of all crisis grants.

A. SDR-OM-6

- a. 40,423 customers received a LIHEAP grant in the most recent heating season (2019-2020). Please note this response includes all LIHEAP grants, both cash and crisis.
 - b. The total amount of grants was \$17,851,382 (cash and crisis).
 - c. 15,613 customers received a crisis grant.
 - d. The total amount of crisis grants was \$6,817,443.
- Please note the response above provides LIHEAP grant and customer information on a total Company basis, there is no allocation between Electric and Gas.

Q. SDR-OM-7 Please state whether the Company provides any type of allowances or incentive payments to builders or others for installing electric service or appliances. If yes, please provide complete details, including the amount of such payments or incentives in the historical and future test years and where such payments are included in the Company's claim.

A. SDR-OM-7 The Company does not provide any such allowances or incentives to builders or others for installing electric service or appliances. Builders and developers are, however, entitled to a revenue credit against the customer advance /customer contribution required for extensions of the Company's lines in accordance with the terms of Rule 7 of PECO's Commission approved tariff and of Rule 10.8 under certain circumstances, for relocations in conjunction with new load.

Clarification to question:

Act 129 incentives are provided to encourage builders and customers to install "energy efficient" equipment and appliances in lieu of "standard efficiency" equipment and appliances. They are not incentives to encourage the installation of "electric" equipment in lieu of some other fuel source (i.e. incenting the installation of an electric heat pump over a split system with a natural gas furnace).

Q. SDR-OM-8 Please provide an itemized breakdown of the Company's ASM costs by component, by program in each month of the historic and future test years.

A. SDR-OM-8 Historically, PECO has not offered a demand response (DR) product targeting Ancillary Service Markets (ASM). PECO does not currently plan to offer any ancillary DR products in the future.

- Q. SDR-OM-9 Has the Company included, in the future test year, any claims for advertising expenses related to direct cash grants and/or co-op advertising to builders or developers of residential housing that promotes electric usage over natural gas usage? If yes, provide the following:
- a. A breakdown of expenses claimed and the FERC accounts wherein the expense has been included.
 - b. The results of any cost/benefit analysis conducted by the Company relative to these programs.
 - c. Examples of the co-op advertising.

- A. SDR-OM-9 No, the Company has not included in its operating and maintenance expenses claimed for recovery in either its future test year or fully projected future test year any of the categories of advertising expenses identified in this question.

Q. SDR-OM-10 Has the Company claimed any expenses related to cash incentives or grants to ratepayers either for replacing existing heating equipment or converting? If yes, provide details on the programs and the amount of expense included in the future test year.

A. SDR-OM-10 The Company has not claimed any expenses related to cash incentives or grants to ratepayers either for replacing or converting existing heating equipment.

- Q. SDR-OM-11 Please provide a breakdown of FERC Account 926, Employee Benefits by benefit program or plan for the preceding three calendar years and the amounts projected for the FTY.
- A. SDR-OM-11 Refer to Attachment SDR-OM-11(a) for the breakdown of FERC Account 926, Employee Pensions and Benefits, for Electric Distribution.

PECO Energy Company - Electric Distribution

Analysis of Employee Pensions and Benefits
Years Ended December 31,
(Thousands of Dollars)

Line No.	Expense	2018	2019	2020	2021	2022
<u>Account 926 - Employee Pensions and Benefits Expense</u>						
1	Pension	\$8,811	\$4,468	\$3,050	\$1,502	(\$2,795)
2	Post Retirement Benefits	(408)	537	(905)	245	1,553
3	Medical*	12,572	13,306	13,658	13,703	14,648
4	401K	4,109	4,701	5,087	4,190	4,372
5	Employee Stock Purchase Plan (ESPP)	385	420	567	606	643
6	Disability Plan	253	283	285	359	374
7	Tuition Reimbursement	511	585	608	514	525
8	Workers Compensation**	362	657	-		
9	Other Benefit Plans	387	365	332	496	519
10	Total Account 926	<u>\$26,982</u>	<u>\$25,323</u>	<u>\$22,683</u>	<u>\$21,614</u>	<u>\$19,839</u>

*Medical is defined as Medical, Dental and Vision

**Some workers compensation expenses in 2018 and 2019 were included in FERC Account 926 - Employee Pensions and Benefits instead of FERC Account 925 - Injuries and Damages, as is required under the FERC USoA. PECO's revenue requirement model is not impacted, as both FERC Account 925 and FERC Account 926 are appropriately included within.

- Q. SDR-OM-12 Please state whether the Company has included expenses related to SFAS No. 112 in its test year claim. If so, please provide complete details and include a copy of the actuarial study.
- A. SDR-OM-12 With the exception of Exelon Business Services Company (BSC) severance expenses, there are no other ASC 712 (SFAS No. 112) related expenses included in the Company's test year claim. The FTY and FPFTY BSC severance expense are \$278,113 and \$295,668 respectively, which are based on historical trend. There is no actuarial study available for severance expenses.

Q. SDR-OM-13 Please state whether any portion of the Company's membership dues have been allocated "below the line". If so, please identify any such amounts for the FTY.

A. SDR-OM-13 Refer to Attachment SDR-OM-13(a), which details the portion of the Company's membership dues that have been allocated "below the line".

**PECO ENERGY COMPANY
SOCIAL AND SERVICE ORGANIZATIONS
ELECTRIC DISTRIBUTION**

<u>Association</u>	<u>FY 2021 (dollars)</u>	<u>FY 2022 (dollars)</u>
BSC Allocated	335,626	333,252
Barnes Foundation	18,905	18,905
Philadelphia Museum of Art	18,905	18,905
Philanthropy Network	11,343	11,343
Philadelphia Association of Community Development Corporations	8,400	8,400
Leadership Philadelphia	7,562	7,562
Pennsylvania Academy of the Fine Arts	7,562	7,562
Committee Of Seventy	3,735	3,735
Pennsylvania Society	3,735	3,735
Forum Exec Women	3,781	3,781
The Academy of Natural Sciences	3,781	3,781
Center City Proprietors Association	1,891	1,891
Forum for a Better Pennsylvania	756	756
TOTAL	<u>425,983</u>	<u>423,609</u>

Q. SDR-OM-14 Please provide the level of each of the following which is included in the Company's cost of service by separate type and/or payee, which are incurred directly by the Company or are allocated or billed to the Company by affiliates or its parent company.

- a. fines and penalties
- b. contributions and donations
- c. membership dues
- d. lobbying expense
- e. employee activity costs (e.g. picnics, parties, awards)
- f. investor relations expenses

A. SDR-OM-14

- a. None. These costs are not included in the Company's test year claim.
- b. None. These costs are not included in the Company's test year claim.
- c. Refer to Attachment SDR-OM-14(a).
- d. None. These costs are not included in the Company's test year claim.
- e. Refer to Attachment SDR-OM-14(b).
- f. The budgeted allocations from Exelon Business Services Company to PECO Electric Distribution for investor relations expenses in 2021 and 2022 are \$96,745 and \$107,741, respectively.

c. Membership Dues (Electric Distribution Only)

Industry Organization	2021 Budget	2022 Budget
Electric Power Research Institute	379,558	389,047
Edison Electric Institute	415,140	426,788
Energy Association of Pennsylvania	194,507	200,342
R&D Memberships	198,925	203,897
Select Greater Philadelphia	84,000	84,000
Greater Philadelphia Chamber	75,516	76,081
Electrical Association of Philadelphia	63,019	84,025
Centre for Energy Advancement through Technological Innovation	51,417	52,703
Avolin	42,100	47,994
Georgia Tech Research Corp.	29,239	29,970
Economy League of Greater Philadelphia	27,098	27,775
3E Company	18,361	18,361
IHS Global Inc	15,400	15,400
PA Chamber of Business and Industry Education Foundation	15,124	15,124
Pennsylvania Business Council	14,045	14,395
County/City Commerce	13,783	13,783
Greater Philadelphia Hispanic Chamber of Commerce	11,343	11,343
Pennsylvania Biotechnology Center	10,500	8,610
Power Systems Engineering Research Center	8,702	8,920
World Trade Center of Greater Phila	8,610	8,610
Independence Business Alliance	7,562	7,562
Greater Phila Alliance for Capital and Technologies	5,040	5,040
Philadelphia Convention & Visitors Bureau Foundation	4,991	4,991
Central Philadelphia Development Corp	2,269	2,269
Manufacturing Alliance of Phila	2,100	2,100
Wildlife Habitat Council	1,749	1,749
Avian Power Line Interaction Committee	1,562	1,562
Industrial Asset Management Council	1,260	1,260
Pennsylvania Economic Development Association	1,260	1,260
Greater Valley Forge Transportation	1,158	1,158
Other	3,971	3,971
Total	<u>\$ 1,709,307</u>	<u>\$ 1,770,089</u>

e. Employee Activity Costs (e.g. picnics, parties, awards) - Electric Distribution only

	2021 Budget	2022 Budget
Employee Recognition Awards	\$194,670	\$199,537
Employee Service Awards		
pins and small gifts for years of service	111,087	113,864
Employee Compact:		
Employee Picnic, Celebration, Other Employee Compact expenses	435,880	435,880
Employee Network Groups	7,750	7,750
TOTAL EMPLOYEE ACTIVITY COSTS	\$749,387	\$757,031

Q. SDR-OM-15 If applicable, please provide a copy of the billing and payment terms for all contracts between the Company and its parent or an affiliated company for services. Further, to the extent that the parent or affiliated company provides service to non-affiliated companies, please provide the corresponding billing and payment terms.

A. SDR-OM-15 The Company has two over-arching agreements that govern the provision of services with affiliates, the General Services Agreement (“GSA”) (Attachment SDR-OM-15(a)), which governs services provided by Exelon Business Services Company (“EBSC”), and the Mutual Services Agreement (“MSA”) (Attachment SDR-OM-15(b)), which governs services provided by PECO to other affiliates or services received by PECO from non-EBSC affiliates, both of which were approved by the Commission on January 1, 2001 as part of the ComEd/Exelon merger, and then re-approved by the Commission in 2013 at Docket No. G-2010-2211383.

The payment terms for services provided under the GSA are set forth in EBSC Associate Transaction Procedures Manual and Service Catalog (Attachments SDR-OM-15(c) and (d), respectively).

The payment terms for services provided under the MSA are set forth in PECO’s Cost Allocation Manual and associated work orders, known as Affiliate Level Arrangements (“ALAs”). A copy of the PECO Cost Allocation Manual and the ALA template showing the pricing rule table are also attached (Attachments SDR-OM-15(e) and (f), respectively).

Since April of 2013, PECO has been providing the Commission with its Service Level Agreements (“SLAs”) and ALAs, for informational purposes, as those arrangements are modified.

Exelon’s parent and affiliated companies typically do not provide services to non-affiliated companies except in limited circumstances. Specifically, PECO’s utility affiliates provide utility service to their customers pursuant to their regulated tariffs, and PECO’s affiliated generation company and

retail sales affiliates sell generation services and related services at market rates to unaffiliated parties. In addition, Exelon Utility companies may provide mutual storm and emergency assistance to unaffiliated utilities on a cost basis pursuant to industry-wide mutual assistance agreements.

GENERAL SERVICES AGREEMENT

BETWEEN

EXELON BUSINESS SERVICES COMPANY

AND

EXELON CORPORATION; EXELON ENERGY DELIVERY COMPANY, LLC;
COMMONWEALTH EDISON COMPANY; PECO ENERGY COMPANY; EXELON
VENTURES COMPANY, LLC; EXELON GENERATION COMPANY, LLC; EXELON
ENTERPRISES COMPANY, LLC; UNICOM INVESTMENT INC.; AND THE
SUBSIDIARIES, AFFILIATES AND ASSOCIATES OF EACH LISTED ENTITY.

THIS AGREEMENT, made and entered into this 1st day of January, 2001, by
and between the following Parties: EXELON BUSINESS SERVICES COMPANY ("Services
Company"), EXELON CORPORATION; EXELON ENERGY DELIVERY COMPANY, LLC;
COMMONWEALTH EDISON COMPANY; PECO ENERGY COMPANY; EXELON
VENTURES COMPANY, LLC; EXELON GENERATION COMPANY, LLC; EXELON
ENTERPRISES COMPANY, LLC; UNICOM INVESTMENT INC; AND THE
SUBSIDIARIES, AFFILIATES AND ASSOCIATES OF EACH LISTED ENTITY
(collectively, the "Client Companies");

WITNESSETH:

WHEREAS, Client Companies, including EXELON CORPORATION, which is
registered under the terms of the Public Utility Holding Company Act of 1935 (the "Act") and its
other subsidiaries, affiliates and associates desire to enter into this agreement providing for the

performance by Services Company for the Client Companies of certain services as more particularly set forth herein;

WHEREAS, Services Company is organized, staffed and equipped and has filed with the Securities and Exchange Commission ("the SEC") to be a subsidiary service company under Section 13 of the Act to render to EXELON CORPORATION, and other subsidiaries, affiliates and associates of EXELON CORPORATION, certain services as herein provided; and

WHEREAS, to maximize efficiency, and to achieve merger related savings, the Client Companies desire to avail themselves of the advisory, professional, technical and other services of persons employed or to be retained by Services Company, and to compensate Services Company appropriately for such services;

NOW, THEREFORE, in consideration of these premises and of the mutual agreements set forth herein, the Parties agree as follows:

Section 1. Agreement to Provide Services

Services Company agrees to provide to Client Companies, upon the terms and conditions set forth herein, the services hereinafter referred to and described in Section 2, at such times, for such period and in such manner as Client Companies may from time to time request. Except with respect to "Corporate Governance Services" as defined in Section 7 hereof, the Services Company shall perform only those services as are requested by the Client Companies. Services Company will keep itself and its personnel available and competent to provide to Client Companies such services so long as it is authorized to do so by the appropriate federal and state regulatory agencies. In providing such services, Services Company may arrange, where it deems

appropriate, for the services of such experts, consultants, advisers and other persons with necessary qualifications as are required for or pertinent to the provision of such services.

Section 2. Services to be Provided

The services expected to be provided by Services Company hereunder may, upon request by a Client Company, include the services as set out in Schedule 2, attached hereto and made a part hereof. In addition to those identified in Schedule 2, Services Company shall provide such additional general or special services, whether or not now contemplated, as Client Companies may request from time to time and Services Company determines it is able to provide.

Notwithstanding the foregoing paragraph, no change in the organization of the Services Company, the type and character of the companies to be serviced, the factors for allocating costs to associate companies, or in the broad general categories of services to be rendered subject to Section 13 of the Act, or any rule, regulation or order thereunder, shall be made unless and until the Services Company shall first have given the SEC written notice of the proposed change not less than 60 days prior to the proposed effectiveness of any such change. If, upon the receipt of any such notice, the SEC shall notify the Services Company within the 60-day period that a question exists as to whether the proposed change is consistent with the provisions of Section 13 of the Act, or of any rule, regulation or order thereunder, then the proposed change shall not become effective unless and until the Services Company shall have filed with the SEC an appropriate declaration regarding such proposed change and the SEC shall have permitted such declaration to become effective.

Section 3. Changes in Parties

New direct or indirect subsidiaries, affiliates and associates of EXELON CORPORATION, which may come into existence after the effective date of this Services Agreement, may become additional Client Companies of Services Company and subject to this General Services Agreement. In addition, entities which are, as of the effective date of this General Services Agreement, direct or indirect subsidiaries, affiliates and associates of EXELON CORPORATION, may thereafter leave the holding company system, in which case they will no longer be subject to this General Services Agreement. The parties hereto shall make such changes in the scope and character of the services to be provided and the method of assigning, distributing or allocating costs of such services as may become necessary to achieve a fair and equitable assignment, distribution, or allocation of Services Company costs among associate companies taking into account both the new subsidiaries and the subsidiaries which have left the holding company system, subject to the provisions of Section 2 above.

Section 4. Compensation of Services Company

As compensation for the services to be rendered hereunder, Client Companies listed in Attachment A hereto, as revised from time to time, shall pay to Services Company all costs which reasonably can be identified and related to particular services provided by Services Company for or on Client Company's behalf (except as may otherwise be permitted by the SEC). All other Client Companies and their affiliates and associates (see Attachment B) shall pay to Services Company charges for services that are to be no less than cost (except as may otherwise be permitted by the SEC), insofar as costs can reasonably be identified and related by Services Company to its performance of particular services for or on behalf of Client Company.

The services described herein or contemplated to be provided hereunder shall be directly assigned, distributed or allocated by activity, project, program, work order or other appropriate basis. The factors for assigning or allocating Services Company costs to Client Company, as well as to other associate companies, are set forth in Schedules 1 and 2 attached hereto. Attachments A and B and Schedules 1 and 2 are each expressly incorporated herein and made a part hereof.

Any charges to the Client Companies on account of use of capital shall reflect a reasonable and efficient capital structure.

Section 5. Securities and Exchange Commission Rules

It is the intent of the Parties that the determination of the costs as used in this Agreement shall be consistent with, and in compliance with, the rules and regulations of the SEC, as they now exist or hereafter may be modified by the Commission.

Section 6. Service Review

The parties shall review each service covered by this Agreement on an as needed basis, to assess the quality of the service and to determine the continued need therefor, and shall, subject to the provisions of Section 2 above, amend the scope of services, delete services entirely from this Agreement, and/or decline services which are not "Corporate Governance Services," as defined in Section 7 hereof, as they determine to be necessary or desirable.

Section 7. Corporate Governance Services.

Whether or not requested by the Client Companies, the Services Company may provide to all Client Companies, and Client Companies shall pay Services Company for, "Corporate Governance Services." Corporate governance consists of those activities and services reasonably determined to be necessary for the lawful and effective management of Exelon System businesses. Corporate Governance Services may be supplied from functions such as accounting, finance, executive, strategic planning, legal, human resources/benefits, audit, corporate communications and public affairs, environmental, health and safety, government affairs and policy, and investor relations. Corporate Governance Services may include, but are not limited to, the following: planning and project evaluation; finance and treasury; accounting and analysis; risk management; tax; shareholder and investor relations; merger and acquisition services; strategic planning; diversity; employee and labor relations; HR planning and development; compensation and benefits; legal services in the areas of securities, PUHCA, employment, regulatory, contract, litigation and intellectual property laws; legal and administrative support to the Board of Directors; environmental compliance activities; ethics and compliance programs; management services for compliance with Federal laws, regulations and other policy requirements, including relationship management with the U.S. Congress and Federal agencies; corporate communications; branding; corporate events; charitable support; community relations and communications to local organizations; and communications to employees.

Section 8. Payment

Payment shall be by making remittance of the amount billed or by making

appropriate accounting entries on the books of the companies involved. Invoices shall be prepared on a monthly basis for services provided hereunder.

Section 9. EXELON CORPORATION

Except as authorized by rule, regulation, or order of the SEC, nothing in this Agreement shall be read to permit EXELON CORPORATION, or any person employed by or acting for EXELON CORPORATION, to provide services for other Parties, or any companies associated with said Parties.

Section 10. Client Companies

Except as limited by law or order of the SEC, Client Companies, their subsidiaries, affiliates and associates may provide services described herein to other Client Companies, their subsidiaries, affiliates and associates on the same terms and conditions as set out for the Services Company.

Section 11. Effective Date and Termination

This Agreement is executed subject to the consent and approval of all applicable regulatory agencies, and if so approved in its entirety, shall be deemed effective from the date that the merger between PECO ENERGY COMPANY and UNICOM CORPORATION was consummated, and shall remain in effect from said date unless terminated by mutual agreement or by any Party giving at least 90 days' written notice to the other Parties prior to the beginning of any calendar year, each Party fully reserving the right to so terminate this Agreement.

This Agreement may also be terminated or modified to the extent that performance may conflict with any rule, regulation or order of the SEC adopted before or after the making of this Agreement. This Agreement shall be terminated with respect to any Client Company immediately upon such Client Company ceasing to be a member of the Exelon holding company system.

The Parties' obligations under this Agreement which by their nature are intended to continue beyond the termination or expiration of this Agreement shall survive such termination or expiration.

Section 12. Access to Records

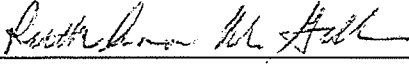
Records will be maintained in accordance with 17 C.F.R. §257 and in any event no less than seven years following a transaction under this Agreement. The Client Company may request access to and inspect the accounts and records of the Services Company, provided that the scope of access and inspection is limited to accounts and records that are related to such transaction.

Section 13. Assignment

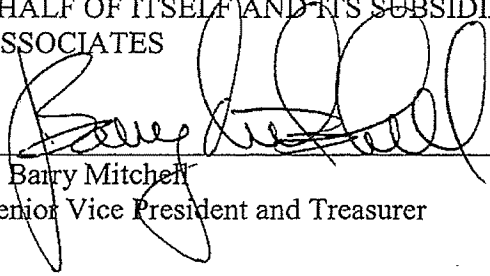
This Agreement and the rights hereunder may not be assigned without the mutual written consent of all Parties hereto.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed and attested by their authorized officers as of the day and year first above written.

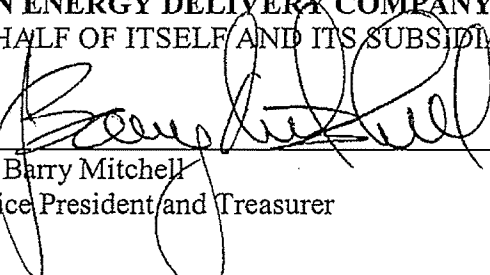
EXELON BUSINESS SERVICES COMPANY

By 
Ruth Ann M. Gillis
Title: President

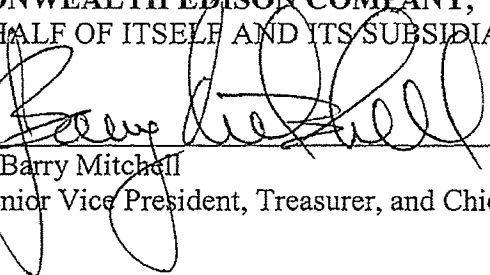
EXELON CORPORATION,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES, AFFILIATES
AND ASSOCIATES

By 
J. Barry Mitchell
Title: Senior Vice President and Treasurer

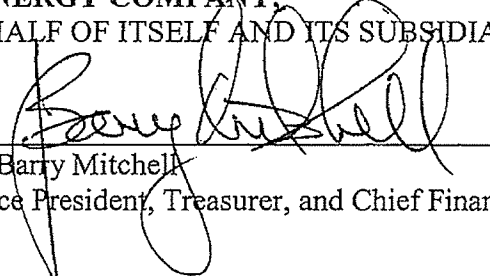
EXELON ENERGY DELIVERY COMPANY, LLC,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES

By 
J. Barry Mitchell
Title: Vice President and Treasurer

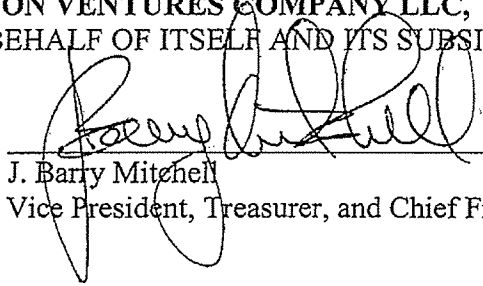
COMMONWEALTH EDISON COMPANY,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES

By 
J. Barry Mitchell
Title: Senior Vice President, Treasurer, and Chief Financial Officer

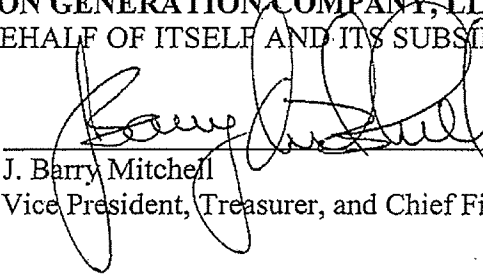
PECO ENERGY COMPANY,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES

By 
J. Barry Mitchell
Title: Vice President, Treasurer, and Chief Financial Officer

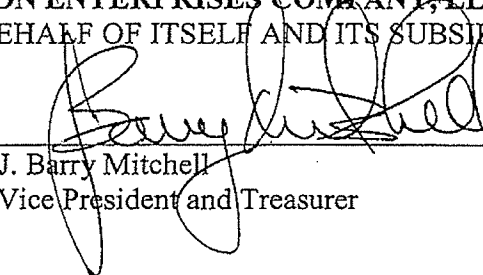
EXELON VENTURES COMPANY LLC,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES

By 
J. Barry Mitchell
Title: Vice President, Treasurer, and Chief Financial Officer

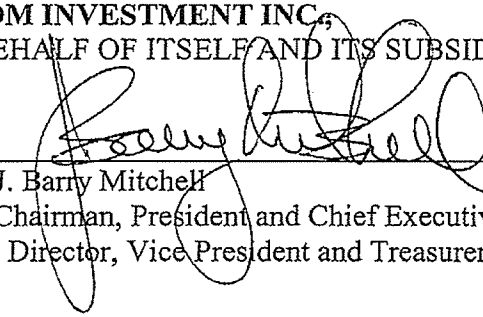
EXELON GENERATION COMPANY, LLC,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES

By 
J. Barry Mitchell
Title: Vice President, Treasurer, and Chief Financial Officer

EXELON ENTERPRISES COMPANY, LLC,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES

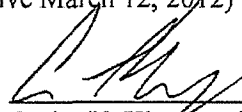
By 
J. Barry Mitchell
Title: Vice President and Treasurer

UNICOM INVESTMENT INC.,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES

By 
J. Barry Mitchell
Title: Chairman, President and Chief Executive Officer,
Director, Vice President and Treasurer

BALTIMORE GAS AND ELECTRIC COMPANY,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(effective March 12, 2012)

By



Carim V. Khouzami

Title: Vice President, Chief Financial Officer and Treasurer

ATLANTIC CITY ELECTRIC COMPANY
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: Donna J. Kinzel

Name: Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer, and Treasurer

DELMARVA POWER & LIGHT COMPANY
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: Donna J. Kinzel

Name: Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer, and Treasurer

POTOMAC ELECTRIC POWER COMPANY
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: Donna J. Kinzel

Name: Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer, and Treasurer

PEPCO HOLDINGS LLC
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: Donna J. Kinzel

Name: Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer, and Treasurer

PHI SERVICE COMPANY
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: Donna J. Kinzel

Name: Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer, and Treasurer

Attachment A

Commonwealth Edison Company

Commonwealth Edison of Indiana, Inc.

PECO Energy Company

Exelon Generation Company, LLC

Baltimore Gas and Electric Company (effective March 12, 2012)

Atlantic City Electric Company (effective March 24, 2016)

Delmarva Power & Light Company (effective March 24, 2016)

Potomac Electric Power Company (effective March 24, 2016)

PEPCO Holdings LLC (effective March 24, 2016)

PHI Service Company (effective March 24, 2016)

Any subsidiary involved in directly providing goods, construction or services to the foregoing companies.

Service Agreement Schedule 1

Allocation Ratios:

General:

Direct charges shall be made so far as costs can be identified and related to the particular transactions involved without excessive effort or expense. Other elements of cost, including taxes, interest, other overhead, and compensation for the use of capital procured by the issuance of capital stock, shall be fairly and equitably allocated using the ratios set forth below.

Revenue Related Ratios:

Revenues
Sales - Units sold and/or transported
Number of Customers

Expenditure Related Ratios:

Total Expenditures
Operations and Maintenance Expenditures
Capital Expenditures
Service Company Billings
Service Company SLA Billings (Non-governance)

Labor/Payroll Related Ratios:

Labor / Payroll
Number of Employees

Units Related Ratios:

Usage (for example: CPU's, square feet , number of vendor invoice payments)
Consumption (for example: tons of coal, gallons of oil, MMBTU's)
Capacity (for example: nameplate generating capacity, peak load, gas throughput)
Other units related

Assets Related Ratios:

Total Assets
Current Assets
Gross Plant

Composite Ratios:

Total Average Assets and 12 months ended Gross Payroll
Modified Massachusetts Formula
Other composite ratios

Service Agreement Schedule 2

Services Including But Not Limited To:

General:

Direct charges shall be made so far as costs can be identified and related to the particular transactions involved without excessive effort or expense. Other elements of cost, including taxes, interest, other overhead, and compensation for the use of capital procured by the issuance of capital stock, shall be fairly and equitably allocated using the ratios set forth in Schedule 1.

Administrative & management services including but not limited to:

- accounting
 - bookkeeping
 - billing
 - accounts receivable
 - accounts payable
 - financial reporting
- audit
- claims
- communications
- customer operations
- customer services
- executive
- finance
- insurance
- information systems services
- investment advisory services
- legal
- library
- record keeping
- secretarial & other general office support
- real estate management
- security holder services
- tax
- treasury
- other administration & management services

Expected allocation ratios: Revenue Related, Expenditure Related, Labor/Payroll Related, Units Related, Assets Related, Composite

Personnel services including but not limited to:

- recruiting
- training & evaluation services
- payroll processing
- employee benefits administration & processing
- labor negotiations & management
- other personnel services

Expected allocation ratios: Labor/Payroll Related, Units Related, Composite

Purchasing services including but not limited to:

- preparation & analysis of product specifications
- requests for proposals & similar solicitations
- vendor & vendor-product evaluations
- purchase order processing
- receipt, handling, warehousing and disbursement of purchased items contract negotiation & administration
- inventory management & disbursement
- other purchasing services

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Assets Related, Composite

Facilities management services including but not limited to:

- office space
- warehouse & storage space
- transportation facilities (including dock & port, rail sidings and truck facilities)
- repair facilities
- manufacturing & production facilities
- fixtures, office furniture & equipment

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Composite

Computer services including but not limited to:

- computer equipment & networks
- peripheral devices
- storage media
- software

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Assets Related, Composite

Communications services including but not limited to:

- communications equipment
- audio & video equipment
- radio equipment
- telecommunications equipment & networks
- transmission & switching capability

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Assets Related, Composite

Machinery management services including but not limited to:

- equipment
- tools
- parts & supplies

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Composite

Vehicle management services including but not limited to:

- automobiles
- trucks
- vans
- trailers
- railcars
- marine vessels
- aircraft
- transport equipment
- material handling equipment
- construction equipment

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Composite

Operational services including but not limited to:

- drafting & technical specification, development & evaluation
- consulting
- engineering
- environmental
- safety
- nuclear
- construction

design
resource planning
economic & strategic analysis
research
testing
training
customer solicitation
support & other marketing related services
public & governmental relations
other operational services

Expected allocation ratios: Revenue Related, Expenditure Related, Labor/Payroll Related,
Units Related, Assets Related, Composite

Exhibit B

Service Level Arrangement

Arrangement between _____ Services Department and [Client Company]

Purpose

Governing Agreement

Term of Service

Scope of Services

Scope of Services

Service Responsibility Matrix

Services, Tasks		

Service Costing Schedule

Monthly Billing Table:

Service/Transaction	Estimated Monthly Billing

Performance Metrics & Performance Reporting

Signatures			
Manager Service Company		Name (Client) Title	
<div> <div></div> <div>Signature</div> </div> <div> <div></div> <div>Date</div> </div>		<div> <div></div> <div>Signature</div> </div> <div> <div></div> <div>Date</div> </div>	

Exhibit C

Project Charter

Mission:

Objective

-
-

Business Need / Expected Benefits

-

Project Approach

-
-
-

Measures of Success / Effectiveness

-
-

Project Team

- Sponsor -
- Responsible Director –
- Project Manager –
- Project Team –

High Level Schedule

Activity or Deliverable	Start Date	End Date

High Level Cost Estimate

Item	Cost

Major Risks and Issues

-

Assumptions and Constraints

-

Project Charter Authorizing Signatures

Name / Title	Signature	Date

MUTUAL SERVICES AGREEMENT**BETWEEN****PECO ENERGY COMPANY****AND****EXELON CORPORATION AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY EXELON CORPORATION****AND****EXELON GENERATION COMPANY, LLC AND ANY OR ALL OF ITS
SUBSIDIARIES AND/OR AFFILIATES WHOLLY OR PARTLY-OWNED
BY EXELON GENERATION COMPANY, LLC****AND****EXELON ENTERPRISES, LLC AND ANY OR ALL OF ITS SUBSIDIARIES
AND/OR AFFILIATES WHOLLY OR PARTLY-OWNED BY
EXELON ENTERPRISES COMPANY, LLC****AND****COMMONWEALTH EDISON COMPANY AND ANY OR ALL OF ITS
SUBSIDIARIES AND/OR AFFILIATES WHOLLY OR PARTLY-OWNED BY
COMMONWEALTH EDISON COMPANY**

THIS AGREEMENT, made and entered into this 1st day of January, 2001, by and between the following: PECO ENERGY COMPANY ("PECO"), a Pennsylvania Corporation; and Exelon Corporation ("Exelon") and any or all of its subsidiaries and/or affiliates wholly or partly-owned by Exelon Corporation; Exelon Generation Company, LLC ("Genco") and any or all of its subsidiaries and/or affiliates wholly or partly-owned by Genco; Exelon Enterprises Company, LLC ("Enterprises") and any or all of its subsidiaries and/or affiliates wholly or partly-owned by Enterprises; and Commonwealth Edison Company ("ComEd") and any or all of its subsidiaries and/or affiliates wholly or partly-owned by ComEd (hereinafter collectively the "Affiliates," PECO and its Affiliates are collectively referred to as "Parties.")

WITNESSETH:

WHEREAS, the Parties desire to enter into this Agreement providing for the performance of certain services as more particularly set forth herein; and

WHEREAS, to maximize efficiency, and to achieve cost savings, the Parties desire to avail themselves of the benefits of having services provided by the least cost provider thereof whenever possible, and to compensate such provider appropriately for such services;

NOW, THEREFORE, in consideration of these premises and of the mutual agreements set forth herein, the Parties agree as follows:

Section 1. Definitions

Commission – the Pennsylvania Public Utility Commission.

Providing Company – one or more Parties to this Agreement that have agreed to provide requested services to another Party in accordance with the terms of this Agreement.

Requesting Company – one or more Parties to this Agreement that are requesting services to be provided by another Party in accordance with the terms of this Agreement

Section 2. Agreement to Provide Services

PECO and Affiliates agree to provide, upon the terms and conditions set forth herein, services including but not limited to those services hereinafter referred to and described in Section 3, at such times, for such period and in such manner as Requesting Company may from time to time request and Providing Company concludes it is able and willing to provide. In providing such services, Providing Company may arrange, as it deems appropriate, for the services of such experts, consultants, advisers, and other persons with necessary qualifications as are required for or pertinent to the provision of the requested services.

Section 3. Services to be Provided

A Providing Company shall render services as Requesting Company may request from time to time and Providing Company determines it is able and willing to perform.

Section 4. New Affiliates

New direct or indirect affiliates of PECO, which may come into existence after the effective date of this Mutual Service Agreement, may become parties to this Agreement. The Parties hereto shall make such changes in the scope and character of the services to be provided and the method of assigning, distributing or allocating costs of such services as may become necessary to achieve a fair and equitable assignment, distribution, or allocation of costs among all Requesting Companies, including the new affiliates.

Section 5. Compensation of Providing Company

As compensation for the services to be provided hereunder, a Requesting Company shall generally pay to Providing Company charges for services that are no more than the cost thereof (except as otherwise directed or permitted by an appropriate regulatory authority), insofar as costs can reasonably be identified and related to the particular services in question or otherwise fairly and equitably allocated to such services. To the extent that PECO or its affiliated Electric Generation Supplier (as that term is defined in the Pennsylvania Public Utility Code) are participants in a particular transaction, the Requesting Company shall pay to Providing Company charges for services that comply with the Commission's decisions, rules and regulations, including the Commission-approved settlement of Docket Nos. R-00973953 and P-00971265 and Appendices G and H thereto. In addition, all transactions conducted hereunder shall be subject to the Public Utility Holding Company Act of 1935, as administered by the Securities and Exchange Commission.

Section 6. Service Requests

The services described herein or contemplated to be provided hereunder shall be directly assigned, distributed or allocated by activity, project, program, work order or other appropriate basis.

Section 7. Payment

Payment shall be by making remittance of the amount billed or by making appropriate accounting entries on the books of the companies involved. Invoices shall be prepared on a monthly basis for services provided hereunder.

Section 8. Effective Date and Termination

This Agreement has been approved by the Commission in Docket No. A-110550F0147 and shall become effective as of the date of execution and shall remain in effect from said date unless terminated by the Commission or by mutual agreement. Any Party may withdraw from this Agreement by giving at least sixty days written notice to the other Parties prior to withdrawal.

Section 9. Access to Records

For the seven years following a transaction under this Agreement, the Requesting Company may request access to and inspect the accounts and records of the Providing Company, provided that the scope of access and inspection is limited to accounts and records that are related to such transaction.

Section 10. Assignment

This Agreement and the rights hereunder may not be assigned without the mutual written consent of all Parties hereto.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed and attested by their authorized officers as of the day and year first above written.

PECO ENERGY COMPANY

By: 

Craig L. Adams

Title: Senior Vice President and
Chief Operating Officer

Date: 7/16/2010

**EXELON GENERATION COMPANY, LLC
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY
EXELON GENERATION COMPANY, LLC**

By: _____

Doyle M. Beneby

Title: Senior Vice President

Date: _____

**EXELON ENTERPRISES COMPANY, LLC
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY
EXELON ENTERPRISES COMPANY, LLC**

By: _____

Carter C. Culver

Title: Chief Executive Officer and President

Date: _____

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be
executed and attested by their authorized officers as of the day and year first above written.

PECO ENERGY COMPANY

By: _____
Craig L. Adams

Title: Senior Vice President and
Chief Operating Officer

Date: _____

**EXELON GENERATION COMPANY, LLC
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY
EXELON GENERATION COMPANY, LLC**

By:  _____
Doyle N. Beneby

Title: Senior Vice President

Date: 7/14/2010

**EXELON ENTERPRISES COMPANY, LLC
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY
EXELON ENTERPRISES COMPANY, LLC**

By: _____
Carter C. Culver

Title: Chief Executive Officer and President

Date: _____

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed and attested by their authorized officers as of the day and year first above written.

PECO ENERGY COMPANY

By: _____
Craig L. Adams

Title: Senior Vice President and
Chief Operating Officer

Date: _____

**EXELON GENERATION COMPANY, LLC
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY
EXELON GENERATION COMPANY, LLC**

By: _____
Doyle M. Beneby

Title: Senior Vice President

Date: _____

**EXELON ENTERPRISES COMPANY, LLC
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY
EXELON ENTERPRISES COMPANY, LLC**

By: _____
Carter C. Culver

Title: Chief Executive Officer and President

Date: July 27, 2010

**EXELON CORPORATION
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY OWNED BY
EXELON CORPORATION**

By: 
Duane M. DesParte

Title: Vice President and Corporate Controller

Date: 7-16-10

**COMMONWEALTH EDISON COMPANY
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY
COMMONWEALTH EDISON COMPANY**

By: _____
Joseph R. Trpik, Jr.

Title: Senior Vice President, Chief Financial Officer
and Treasurer

Date: _____

**EXELON CORPORATION
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY OWNED BY
EXELON CORPORATION**

By: _____
Duane M. DesParte

Title: Vice President and Corporate Controller

Date: _____

**COMMONWEALTH EDISON COMPANY
AND ANY OR ALL OF ITS SUBSIDIARIES AND/OR
AFFILIATES WHOLLY OR PARTLY-OWNED BY
COMMONWEALTH EDISON COMPANY**

By: _____
Joseph R. Triuk, Jr.

Title: Senior Vice President, Chief Financial Officer
and Treasurer

Date: July 28, 2010

VERIFICATION

I, Richard A. Schlesinger, hereby declare that I am Manager, Retail Rates of PECO Energy Company; that, as such, I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Request for Contract Approval are true and correct to the best of my knowledge, information and belief; and that I make this verification subject to the penalties of 18 Pa.C.S. §4904 pertaining to false statements to authorities.


Richard A. Schlesinger

Date: November 17, 2010

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO ENERGY COMPANY'S REQUEST	:	
FOR APPROVAL OF A CONTRACT WITH	:	
AN AFFILIATED INTEREST FILED IN	:	DOCKET NO. ____-_____
COMPLIANCE WITH PECO'S	:	
IMPLEMENTATION PLAN OF THE	:	DOCKET NO. D-2009-2128070
MANAGEMENT EFFICIENCY	:	
INVESTIGATION AT DOCKET	:	
NO. D-2009-2128070	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a true copy of the enclosed **Request for Approval of a Contract** upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL DELIVERY

Irwin A. Popowsky
Tanya J. McCloskey
Office of Consumer Advocate
555 Walnut Street
Forum Place, Fifth Floor
Harrisburg, PA 17101

Johnnie E. Simms
Office of Trial Staff
Pennsylvania Public Utility
Commission
P.O. Box 3265
Harrisburg, PA 17120

William R. Lloyd, Jr.
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Paul T. Diskin, Manager
Bureau of Fixed Utility Services
Pennsylvania Public Utility
Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17120

John Clista
Management Audit Supervisor
Bureau of Audits
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17120

Dated: November 17, 2010



Ward L. Smith

Ward.smith@exeloncorp.com

Counsel for PECO Energy Company

EXELON BUSINESS SERVICES COMPANY

**ASSOCIATE TRANSACTION
PROCEDURES
MANUAL**

January 2021

Introduction

Exelon Business Services Company, LLC (BSC or Services Company) provides a variety of administrative, management and support services to Exelon Corporation and other Exelon system companies and business units (Client Companies). BSC is subject to the rules and regulations of the Federal Energy Regulatory Commission (FERC) pursuant to the Public Utility Holding Company Act of 2005 (PUHCA). In addition, each of the individual state regulated public utility companies have additional requirements related to associate transactions. Where applicable, these requirements have been incorporated into these Policies and Procedures.

Service Agreements and Work Orders

BSC has entered into a General Services Agreement or Service Agreement with Client Companies that is substantially similar to the General Services Agreement (GSA) attached hereto as Exhibit A. The Service Agreement sets forth in general terms the services to be performed by BSC directly or indirectly for Client Companies. BSC and each Client Company will prepare Work Orders, in the form of Service Level Arrangements (SLA), to specify the services to be performed by BSC for a Client Company. A sample SLA is attached hereto as Exhibit B. Additional documentation of work to be performed pursuant to SLAs may be used by the parties.

The purpose of the SLA is to establish service expectations between BSC and each Client Company. Each SLA will be reviewed and agreed upon on an as needed basis by authorized representatives of BSC and each Client Company. In conjunction with this review of SLAs, the allocation methods and ratios presented in Service Agreement Schedules 1 and 2, attached to the GSA, shall be reviewed and agreed upon by the parties.

An SLA typically contains the following elements:

1. Scope of Services
2. Service Level Expectations
3. Unit Cost Expectations
4. Performance Measures
5. Billing Process

Each SLA is approved by the individual(s) authorized to represent BSC and the Client Company related to the services to be provided.

BSC currently has three distinct processes related to SLAs.

1. The SLA process starts with the BSC Service Providers and the Client Companies representatives meeting to agree upon services to be provided over a future period of time, generally one to three years in duration. As BSC has been in operation for over ten years, most services have been defined and have been agreed to by the parties, and have been delivered efficiently and consistently to the Client Companies for a period of time. New service areas and services may be added in the future, or may be removed from the BSC services offerings. The SLA meetings focus on changes to service offerings and on refining the expected quantities to be consumed, as well as on improvements in providing the services or changes in the operational requirements around providing the services, including benchmarking and performance metrics, definition of responsibilities and other provisions between Service Providers and customer. The Service Providers are responsible for the over-all content in the Exelon BSC Service Catalog. Portions of the SLA template and Exelon BSC Service Catalog are reviewed by Legal. Early in the SLA process, the Legal review concentrates on the scope, governing agreement and certain terms and conditions. The Accounting review of the Exelon BSC Service Catalog and SLA drafts takes place near the end of the process and concentrates on the billing approach and pricing table sections of the Exelon BSC Service Catalog for compliance to the GSA and other PUHCA 2005 requirements. BSC Finance will check completed SLAs to make sure that changes are not made after Legal and Accounting review, or if such changes have been made, will obtain Legal and/or Accounting review of the changes. BSC Finance shall retain documentation evidencing the required SLA reviews in accordance with the record retention requirements. BSC works with the accounting and finance departments in the Client Companies to set-up the code block that the customer wants to be charged for the various services, and the level (company level, intermediate level, or department level) at which they wish to be billed. BSC Accounting works with BSC Finance to set up the appropriate accounting – cost capture pools on BSC’s books. For most customers, the BSC Billing Systems journalize the actual monthly charges on the customer’s books during the financial close.
2. The second process relates to change orders and other emergent work that appear after budgets have been locked down and the actual year has begun. Similar to the SLA process, BSC Accounting is involved to review any change orders for GSA and PUHCA compliance, and work with the customers’ accounting departments to set-up and bill each item appropriately.
3. The third process relates to acquisitions or other new potential business for BSC. The BSC Service Providers interface with the M&A Team. The BSC support services costs are developed and include one-time and on-going support costs. Emergent work projects are set-up to collect one-time charges of adding the acquisition into BSC established services. BSC may prepare a proposal capturing integrated support service scope, schedule, budget, and assumptions. Linkage to an existing customer SLA is generally preferred, otherwise a new SLA may need to be created. For new SLA work, general terms and conditions are reviewed and signed by the controlling customer authorizing the work to proceed. BSC Finance and BSC Accounting gets involved in similar roles as mentioned above for the other processes.

Accounting Procedures

BSC will maintain processes which allow it to accumulate costs in Cost Centers and cost pools. Where possible, these costs will be charged out to Client Companies using direct charging methodologies, including time and materials and unit price (standard rate) basis. Cost Centers and cost pools collect resource costs for services and activities described in the Exelon BSC Service Catalog. This process supports the philosophy of billing costs to the Client Company on

an appropriate basis. BSC will use this process to maintain accounting systems to record all of its costs.

Costs will be billed to Client Companies as work is performed and costs are incurred. When a service requested by a Client Company has not been previously specified, a new SLA may be created or the existing one revised. BSC Accounting is responsible for ensuring that all of the billing methodologies are consistent with the GSA.

Direct Costs are defined as those that can be identified as applicable to services performed for a single Client Company or group of Client Companies. Direct costs include the fully distributed cost of providing a particular service. The fully distributed costs include labor costs, labor related costs (such as pensions and benefit costs, and facility costs), IT costs, outside services where applicable, back office support costs of running BSC, and other non-labor costs such as materials and supplies. Direct Costs will be charged to the Client Company or Companies responsible for the activity.

BSC will use direct charging (e.g., standard costing or unit prices and/or time and materials) and cost allocations to bill Client Companies. Under a standard costing methodology, as product or service units are used by the Client Companies, the services are directly billed to Client Companies at standard rates. Standard rates are fully cost burdened billing unit rates used by a specific department for a specified service. These rates are established for a number of services offered by the Services Company including invoice processing cost per invoice, mainframe computing cost per CPU usage, and IT desktop support cost per desktop computer. In general, these standard rates are calculated by estimating the fully distributed cost of providing the service for the year divided by the expected number of units (selected as the unit of measurement) to be consumed by all associated customers.

Residual amounts or costs that cannot be directly billed using reasonable measures will remain in the Cost Center to be allocated to Client Companies on an appropriate basis.

Indirect Costs include those costs of a general nature such as general services, and other support costs which cannot be specifically identified to a specific client company or smaller group of companies or to a specific service and therefore must be allocated. An example of Indirect Costs includes most corporate governance services that benefit all companies, which consists of, for example, functions such as accounting, finance, executive, strategic planning, investor relations, government affairs and policy, and corporate communications. The allocation methods used to assign costs to Client Companies will be based on factors identified in Schedule 1 attached to the GSA.

Services and Service Level Arrangements (SLA)

Based on experience and discussions with the Client Companies, BSC has made available a list of service offerings that are defined in the Exelon BSC Service Catalog for the SLA period. Responsibilities of Client Companies for requesting services are defined in the Exelon BSC Service Catalog. A listing of current SLAs and the Exelon BSC Service Catalog can be found on the Exelon Intranet under Operating Companies – BSC (under Popular Links).

Services provided will be reviewed on an as needed basis by BSC and Client Companies. SLAs will be prepared for on-going and for special services, which benefit one or more Client Companies. Examples of on-going services are payroll processing and IT desktop support. SLAs will be approved by the individual(s) authorized to represent BSC and each Client Company in accordance with Company Capital Approval Policies. In all cases, the authorized approvers representing BSC and the Client Company will be different individuals.

When a new service or project is identified, BSC Finance and BSC Accounting will determine whether a new SLA shall be used or whether the costs shall be captured in an existing SLA. One or more of the following criteria should be considered in determining the need for a new SLA:

1. No existing SLA uses the billing methodology that is needed for the new service project.
2. No existing SLA charges costs to the benefiting Client Company for the new service or project.
3. There is a specific regulatory requirement to allocate costs in a specific manner regardless of amount for the new project/service.
4. No existing SLA captures similar activity or services.
5. The total estimated annual cost of the new service or project is greater than \$500,000.

SLA (Work Order) Monitoring and Control

BSC Finance and BSC Accounting are responsible for reviewing, monitoring and maintaining the SLA (Work Order) and Exelon BSC Service Catalog documentation. BSC Finance and BSC Accounting will also authorize new SLAs as necessary. A formal annual review will be required of all SLAs including a review by legal. As part of the annual review, inactive SLAs will be removed.

Allocation Factors Update and Revisions

Allocation factors will be based on cost drivers specifically applicable to the service provided. BSC Accounting will have the primary responsibility for ensuring that allocation factors are correct, accurate and current. BSC Finance and the Service Providers will assist in gathering required usage and other data to calculate the allocation factors.

BSC Accounting will be responsible for evaluating new allocation methodologies and will consult the Legal Department as needed. Adequate supporting documentation shall be obtained from all associate companies/business units for the raw data used in the allocation methodologies, and maintained in accordance with record retention requirements set forth in the Exelon record retention policy and schedule.

A list of current allocations will be filed annually with the FERC on FERC Form No. 60.

Time Reporting

All BSC employees, including executives, shall keep, within reasonable cost, time records supporting labor charged to separately identifiable goods and services performed for Client Companies. Time records are kept in a timekeeping management system or manually on time sheets.

Employees will record time weekly in a minimum of one-hour increments. Departments may elect to record employees' time in increments smaller than an hour to meet special needs.

The employee's immediate supervisor will review and approve time reports. The BSC Controller's organization will be the authorized delegate for the review of executive time records. Time records will be maintained in accordance with record retention requirements set forth in the Exelon record retention policy and schedule.

Billing and Review

BSC shall prepare a monthly invoice report detailing the services / products provided by Service Area for each Client Company. Payment shall be made by the Client Company by making remittance or by making (offsetting) accounting entries of the amount billed. Payment term (or appropriate offsetting accounting entries) is within thirty days of receipt.

Dispute Resolution Procedure

In the event there is a dispute between the Client Company and BSC regarding a billing methodology and/or amount, representatives of the Services and Client Companies will meet to discuss the issue. If a resolution cannot be reached among the Parties, the issue will be referred to each Party's executive management for final resolution.

Internal Audit Control

Internal Audit, under the direction of the General Auditor, will conduct periodic reviews of BSC's business processes and systems to ensure that the services provided are properly documented and charged to the Client Companies on an appropriate basis. Reviews shall be performed such that all major service areas are evaluated over time. Internal Audit will also conduct reviews of transactions and SLA charge methods to assess whether they comply with

regulatory requirements. Internal Audit will also review the BSC allocations and corporate governance costs every two years.

Internal Audit maintains an independent role and has direct contact to Exelon's Audit Committee. Audit findings, recommendations and progress toward resolution of findings are reported to the Audit Committee and Senior Management as appropriate.

Budgeting

Budgeting for BSC will be a joint effort between it and other Client Companies. Renewal / revision of SLAs for the upcoming budget period will provide the basis for preparing budgets.

Evaluation

BSC will review its costs for competitiveness on a regular basis. Benchmarking and other measurement techniques will be used to the extent deemed appropriate by senior management. Additionally, BSC will also initiate a customer review process to gauge the value and quality of the services provided. Results will be shared with the Client Companies to allow them to evaluate cost effectiveness and assess alternate options.

EXHIBIT A**GENERAL SERVICES AGREEMENT****BETWEEN****EXELON BUSINESS SERVICES COMPANY****AND**

**EXELON CORPORATION; EXELON ENERGY DELIVERY COMPANY, LLC;
COMMONWEALTH EDISON COMPANY; PECO ENERGY COMPANY; EXELON
VENTURES COMPANY, LLC; EXELON GENERATION COMPANY, LLC; EXELON
ENTERPRISES COMPANY, LLC; UNICOM INVESTMENT INC.; AND THE
SUBSIDIARIES, AFFILIATES AND ASSOCIATES OF EACH LISTED ENTITY.**

**THIS AGREEMENT, made and entered into this 1st day of January, 2001, by
and between the following Parties: EXELON BUSINESS SERVICES COMPANY (“Services
Company”), EXELON CORPORATION; EXELON ENERGY DELIVERY COMPANY, LLC;
COMMONWEALTH EDISON COMPANY; PECO ENERGY COMPANY; EXELON
VENTURES COMPANY, LLC; EXELON GENERATION COMPANY, LLC; EXELON
ENTERPRISES COMPANY, LLC; UNICOM INVESTMENT INC; AND THE
SUBSIDIARIES, AFFILIATES AND ASSOCIATES OF EACH LISTED ENTITY
(collectively, the “Client Companies”);**

WITNESSETH:

**WHEREAS, Client Companies, including EXELON CORPORATION, which is
registered under the terms of the Public Utility Holding Company Act of 1935 (the “Act”) and its
other subsidiaries, affiliates and associates desire to enter into this agreement providing for the**

performance by Services Company for the Client Companies of certain services as more particularly set forth herein;

WHEREAS, Services Company is organized, staffed and equipped and has filed with the Securities and Exchange Commission (“the SEC”) to be a subsidiary service company under Section 13 of the Act to render to EXELON CORPORATION, and other subsidiaries, affiliates and associates of EXELON CORPORATION, certain services as herein provided; and

WHEREAS, to maximize efficiency, and to achieve merger related savings, the Client Companies desire to avail themselves of the advisory, professional, technical and other services of persons employed or to be retained by Services Company, and to compensate Services Company appropriately for such services;

NOW, THEREFORE, in consideration of these premises and of the mutual agreements set forth herein, the Parties agree as follows:

Section 1. Agreement to Provide Services

Services Company agrees to provide to Client Companies, upon the terms and conditions set forth herein, the services hereinafter referred to and described in Section 2, at such times, for such period and in such manner as Client Companies may from time to time request. Except with respect to “Corporate Governance Services” as defined in Section 7 hereof, the Services Company shall perform only those services as are requested by the Client Companies. Services Company will keep itself and its personnel available and competent to provide to Client Companies such services so long as it is authorized to do so by the appropriate federal and state regulatory agencies. In providing such services, Services Company may arrange, where it deems

appropriate, for the services of such experts, consultants, advisers and other persons with necessary qualifications as are required for or pertinent to the provision of such services.

Section 2. Services to be Provided

The services expected to be provided by Services Company hereunder may, upon request by a Client Company, include the services as set out in Schedule 2, attached hereto and made a part hereof. In addition to those identified in Schedule 2, Services Company shall provide such additional general or special services, whether or not now contemplated, as Client Companies may request from time to time and Services Company determines it is able to provide.

Notwithstanding the foregoing paragraph, no change in the organization of the Services Company, the type and character of the companies to be serviced, the factors for allocating costs to associate companies, or in the broad general categories of services to be rendered subject to Section 13 of the Act, or any rule, regulation or order thereunder, shall be made unless and until the Services Company shall first have given the SEC written notice of the proposed change not less than 60 days prior to the proposed effectiveness of any such change. If, upon the receipt of any such notice, the SEC shall notify the Services Company within the 60-day period that a question exists as to whether the proposed change is consistent with the provisions of Section 13 of the Act, or of any rule, regulation or order thereunder, then the proposed change shall not become effective unless and until the Services Company shall have filed with the SEC an appropriate declaration regarding such proposed change and the SEC shall have permitted such declaration to become effective.

Section 3. Changes in Parties

New direct or indirect subsidiaries, affiliates and associates of EXELON CORPORATION, which may come into existence after the effective date of this Services Agreement, may become additional Client Companies of Services Company and subject to this General Services Agreement. In addition, entities which are, as of the effective date of this General Services Agreement, direct or indirect subsidiaries, affiliates and associates of EXELON CORPORATION, may thereafter leave the holding company system, in which case they will no longer be subject to this General Services Agreement. The parties hereto shall make such changes in the scope and character of the services to be provided and the method of assigning, distributing or allocating costs of such services as may become necessary to achieve a fair and equitable assignment, distribution, or allocation of Services Company costs among associate companies taking into account both the new subsidiaries and the subsidiaries which have left the holding company system, subject to the provisions of Section 2 above.

Section 4. Compensation of Services Company

As compensation for the services to be rendered hereunder, Client Companies listed in Attachment A hereto, as revised from time to time, shall pay to Services Company all costs which reasonably can be identified and related to particular services provided by Services Company for or on Client Company's behalf (except as may otherwise be permitted by the SEC). All other Client Companies and their affiliates and associates (see Attachment B) shall pay to Services Company charges for services that are to be no less than cost (except as may otherwise be permitted by the SEC), insofar as costs can reasonably be identified and related by Services Company to its performance of particular services for or on behalf of Client Company.

The services described herein or contemplated to be provided hereunder shall be directly assigned, distributed or allocated by activity, project, program, work order or other appropriate basis. The factors for assigning or allocating Services Company costs to Client Company, as well as to other associate companies, are set forth in Schedules 1 and 2 attached hereto. Attachments A and B and Schedules 1 and 2 are each expressly incorporated herein and made a part hereof.

Any charges to the Client Companies on account of use of capital shall reflect a reasonable and efficient capital structure.

Section 5. Securities and Exchange Commission Rules

It is the intent of the Parties that the determination of the costs as used in this Agreement shall be consistent with, and in compliance with, the rules and regulations of the SEC, as they now exist or hereafter may be modified by the Commission.

Section 6. Service Review

The parties shall review each service covered by this Agreement on an as needed basis, to assess the quality of the service and to determine the continued need therefor, and shall, subject to the provisions of Section 2 above, amend the scope of services, delete services entirely from this Agreement, and/or decline services which are not “Corporate Governance Services,” as defined in Section 7 hereof, as they determine to be necessary or desirable.

Section 7. Corporate Governance Services.

Whether or not requested by the Client Companies, the Services Company may provide to all Client Companies, and Client Companies shall pay Services Company for, “Corporate Governance Services.” Corporate governance consists of those activities and services reasonably determined to be necessary for the lawful and effective management of Exelon System businesses. Corporate Governance Services may be supplied from functions such as accounting, finance, executive, strategic planning, legal, human resources/benefits, audit, corporate communications and public affairs, environmental, health and safety, government affairs and policy, and investor relations. Corporate Governance Services may include, but are not limited to, the following: planning and project evaluation; finance and treasury; accounting and analysis; risk management; tax; shareholder and investor relations; merger and acquisition services; strategic planning; diversity; employee and labor relations; HR planning and development; compensation and benefits; legal services in the areas of securities, PUHCA, employment, regulatory, contract, litigation and intellectual property laws; legal and administrative support to the Board of Directors; environmental compliance activities; ethics and compliance programs; management services for compliance with Federal laws, regulations and other policy requirements, including relationship management with the U.S. Congress and Federal agencies; corporate communications; branding; corporate events; charitable support; community relations and communications to local organizations; and communications to employees.

Section 8. Payment

Payment shall be by making remittance of the amount billed or by making

appropriate accounting entries on the books of the companies involved. Invoices shall be prepared on a monthly basis for services provided hereunder.

Section 9. EXELON CORPORATION

Except as authorized by rule, regulation, or order of the SEC, nothing in this Agreement shall be read to permit EXELON CORPORATION, or any person employed by or acting for EXELON CORPORATION, to provide services for other Parties, or any companies associated with said Parties.

Section 10. Client Companies

Except as limited by law or order of the SEC, Client Companies, their subsidiaries, affiliates and associates may provide services described herein to other Client Companies, their subsidiaries, affiliates and associates on the same terms and conditions as set out for the Services Company.

Section 11. Effective Date and Termination

This Agreement is executed subject to the consent and approval of all applicable regulatory agencies, and if so approved in its entirety, shall be deemed effective from the date that the merger between PECO ENERGY COMPANY and UNICOM CORPORATION was consummated, and shall remain in effect from said date unless terminated by mutual agreement or by any Party giving at least 90 days' written notice to the other Parties prior to the beginning of any calendar year, each Party fully reserving the right to so terminate this Agreement.

This Agreement may also be terminated or modified to the extent that performance may conflict with any rule, regulation or order of the SEC adopted before or after the making of this Agreement. This Agreement shall be terminated with respect to any Client Company immediately upon such Client Company ceasing to be a member of the Exelon holding company system.

The Parties' obligations under this Agreement which by their nature are intended to continue beyond the termination or expiration of this Agreement shall survive such termination or expiration.

Section 12. Access to Records

Records will be maintained in accordance with 17 C.F.R. §257 and in any event no less than seven years following a transaction under this Agreement. The Client Company may request access to and inspect the accounts and records of the Services Company, provided that the scope of access and inspection is limited to accounts and records that are related to such transaction.

Section 13. Assignment

This Agreement and the rights hereunder may not be assigned without the mutual written consent of all Parties hereto.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed and attested by their authorized officers as of the day and year first above written.

EXELON BUSINESS SERVICES COMPANY

By /s/ Ruth Ann M. Gillis
Ruth Ann M. Gillis
Title: President

**EXELON CORPORATION,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES, AFFILIATES
AND ASSOCIATES**

By /s/ J. Barry Mitchell
J. Barry Mitchell
Title: Senior Vice President and Treasurer

**EXELON ENERGY DELIVERY COMPANY, LLC,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES**

By /s/ J. Barry Mitchell
J. Barry Mitchell
Title: Vice President and Treasurer

**COMMONWEALTH EDISON COMPANY,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES**

By /s/ J. Barry Mitchell
J. Barry Mitchell
Title: Senior Vice President, Treasurer, and Chief Financial Officer

**PECO ENERGY COMPANY,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES**

By /s/ J. Barry Mitchell
J. Barry Mitchell
Title: Vice President, Treasurer, and Chief Financial Officer

**EXELON VENTURES COMPANY LLC,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES**

By /s/ J. Barry Mitchell
J. Barry Mitchell
Title: Vice President, Treasurer, and Chief Financial Officer

**EXELON GENERATION COMPANY, LLC,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES**

By /s/ J. Barry Mitchell
J. Barry Mitchell
Title: Vice President, Treasurer, and Chief Financial Officer

**EXELON ENTERPRISES COMPANY, LLC,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES**

By /s/ J. Barry Mitchell
J. Barry Mitchell
Title: Vice President and Treasurer

**UNICOM INVESTMENT INC.,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES**

By /s/ J. Barry Mitchell
J. Barry Mitchell
Title: Chairman, President and Chief Executive Officer,
Director, Vice President and Treasurer

BALTIMORE GAS AND ELECTRIC COMPANY,
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(effective March 12, 2012)

By /s/ Carim V. Khouzami
Carim V. Khouzami
Title: Vice President, Chief Financial Officer and Treasurer

ATLANTIC CITY ELECTRIC COMPANY
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: /s/ Donna J. Kinzel
Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer and
Treasurer

DELMARVA POWER & LIGHT COMPANY
ON BEHALF OF ITSELF AND ITS
SUBSIDIARIES (Effective March 24, 2016)

By: /s/ Donna J. Kinzel
Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer and
Treasurer

POTOMAC ELECTRIC POWER COMPANY
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: /s/ Donna J. Kinzel
Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer and
Treasurer

PEPCO HOLDINGS LLC
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: /s/ Donna J. Kinzel
Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer and
Treasurer

PHI SERVICE COMPANY
ON BEHALF OF ITSELF AND ITS SUBSIDIARIES
(Effective March 24, 2016)

By: /s/ Donna J. Kinzel
Donna J. Kinzel

Its: Senior Vice President, Chief Financial Officer and
Treasurer

Attachment A

Commonwealth Edison Company

Commonwealth Edison of Indiana, Inc.

PECO Energy Company

Exelon Generation Company, LLC

Baltimore Gas and Electric Company (effective March 12, 2012)

Atlantic City Electric Company (effective March 24, 2016)

Delmarva Power & Light Company (effective March 24, 2016)

Potomac Electric Power Company (effective March 24, 2016)

PEPCO Holdings LLC (effective March 24, 2016)

PHI Service Company (effective March 24, 2016)

Any subsidiary involved in directly providing goods, construction or services to the foregoing companies.

Attachment B

All other Client Companies and their affiliates and associates not referred to in Attachment A.

Service Agreement Schedule 1**Allocation Ratios:****General:**

Direct charges shall be made so far as costs can be identified and related to the particular transactions involved without excessive effort or expense. Other elements of cost, including taxes, interest, other overhead, and compensation for the use of capital procured by the issuance of capital stock, shall be fairly and equitably allocated using the ratios set forth below.

Revenue Related Ratios:

Revenues
Sales - Units sold and/or transported
Number of Customers

Expenditure Related Ratios:

Total Expenditures
Operations and Maintenance Expenditures
Capital Expenditures
Service Company Billings
Service Company SLA Billings (Non-governance)

Labor/Payroll Related Ratios:

Labor / Payroll
Number of Employees

Units Related Ratios:

Usage (for example: CPU's, square feet , number of vendor invoice payments)
Consumption (for example: tons of coal, gallons of oil, MMBTU's)
Capacity (for example: nameplate generating capacity, peak load, gas throughput)
Other units related

Assets Related Ratios:

Total Assets
Current Assets
Gross Plant

Composite Ratios:

Total Average Assets and 12 months ended Gross Payroll
Modified Massachusetts Formula
Other composite ratios

Service Agreement Schedule 2

Services Including But Not Limited To:

General:

Direct charges shall be made so far as costs can be identified and related to the particular transactions involved without excessive effort or expense. Other elements of cost, including taxes, interest, other overhead, and compensation for the use of capital procured by the issuance of capital stock, shall be fairly and equitably allocated using the ratios set forth in Schedule 1.

Administrative & management services including but not limited to:

- accounting
 - bookkeeping
 - billing
 - accounts receivable
 - accounts payable
 - financial reporting
- audit
- claims
- communications
- customer operations
- customer services
- executive
- finance
- insurance
- information systems services
- investment advisory services
- legal
- library
- record keeping
- secretarial & other general office support
- real estate management
- security holder services
- tax
- treasury
- other administration & management services

Expected allocation ratios: Revenue Related, Expenditure Related, Labor/Payroll Related, Units Related, Assets Related, Composite

Personnel services including but not limited to:

- recruiting
- training & evaluation services
- payroll processing
- employee benefits administration & processing
- labor negotiations & management
- other personnel services

Expected allocation ratios: Labor/Payroll Related, Units Related, Composite

Purchasing services including but not limited to:

- preparation & analysis of product specifications
- requests for proposals & similar solicitations
- vendor & vendor-product evaluations
- purchase order processing
- receipt, handling, warehousing and disbursement of purchased items contract negotiation & administration
- inventory management & disbursement
- other purchasing services

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Assets Related, Composite

Facilities management services including but not limited to:

- office space
- warehouse & storage space
- transportation facilities (including dock & port, rail sidings and truck facilities)
- repair facilities
- manufacturing & production facilities
- fixtures, office furniture & equipment

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Composite

Computer services including but not limited to:

- computer equipment & networks
- peripheral devices
- storage media
- software

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related, Assets Related, Composite

Communications services including but not limited to:

- communications equipment
- audio & video equipment
- radio equipment
- telecommunications equipment & networks
- transmission & switching capability

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related,
Assets Related, Composite

Machinery management services including but not limited to:

- equipment
- tools
- parts & supplies

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related,
Composite

Vehicle management services including but not limited to:

- automobiles
- trucks
- vans
- trailers
- railcars
- marine vessels
- aircraft
- transport equipment
- material handling equipment
- construction equipment

Expected allocation ratios: Expenditure Related, Labor/Payroll Related, Units Related,
Composite

Operational services including but not limited to:

- drafting & technical specification, development & evaluation
- consulting
- engineering
- environmental
- safety
- nuclear
- construction

design
resource planning
economic & strategic analysis
research
testing
training
customer solicitation
support & other marketing related services
public & governmental relations
other operational services

Expected allocation ratios: Revenue Related, Expenditure Related, Labor/Payroll Related,
Units Related, Assets Related, Composite

Exhibit B**Service Level Arrangement**

Arrangement between _____ Services Department and [Client Company]

Scope

Governing Agreement

Term of Service

Services

Scope of Services

Service Responsibility Matrix [Included in Service Catalog]

Services, Tasks		

Billing Approach [Included in Service Catalog]

Pricing Table:

Service, Product # and Description	Billing Approach, Basis, Service Owner

Performance Metrics & Performance Reporting [Included in Service Catalog]

Signatures			
Exelon Business Services Company, LLC		Name (Client) Title	
_____	_____	_____	_____
Signature	Date	Signature	Date

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Exelon BSC Service Catalog – 2021

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Introduction

This EBSC Service Catalog describes all EBSC Services and standard levels of service delivery offered and provided by EBSC Practice Areas to all Exelon's Client Companies.

Practice Areas are:

- Compliance & Audit
- Corporate & Information Security Services (CISS)
- Corporate Affairs
- Corporate Development
- Corporate Strategy, Innovation, & Sustainability (CSIS)
- Executives (Includes GCAs)
- Exelon Utilities (Includes Transmission Strategy & Compliance)

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- Finance
- Government and Regulatory Affairs & Public Policy
- Human Resources
- Investments
- IT
- Legal Services (Includes Corporate Governance)
- Real Estate
- Risk
- Supply
- Transportation

EBSC establishes a Service Level Arrangement (SLA) document with each Client Company to which they provide services. Each EBSC SLA between EBSC and a Client Company documents the specific list of EBSC Services by Practice Area provided to each Client Company as well as any additional Affiliate Specific Assumptions that may be uniquely requested by or provided to that Client Company.

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Service Table Definition

Service Table includes:

- **Service ID and Service Name**, which identifies the service within the Inter-Company Billing system.
- **Service Description**, which describes the content and scope of the BSC Practice Area Services.
- **Service Owner**, leader accountable for the definition, direction and delivery of the service, typically a VP or higher.

FERC Account and Billing Approach Table includes:

- **Service ID and Service Name**, which identifies the service within the Inter-Company Billing system.
- **Major Client FERC Account**, identifies the account per the Federal Energy Regulatory Commission (FERC) uniform system of accounts
- **Billing Approach**, which includes Allocated and Direct:
 - **Allocated**: When the services provided are not specifically assignable to one specific client company and will benefit multiple client companies, the service cost is allocated to the client companies based on a cost causative method.
 - **Direct**: Typically used when resources or costs are attributable to service delivery to one specific customer. Examples include Time and Material costs that are tracked and billed to customers and **R*Q (Unit Based)**: Used when service cost is tied to units of a service consumed by a customer (service driver). During the planning period, demand is forecasted, total cost of service delivery is budgeted, and Unit Price (Rounded) is determined by: $[\text{Service Budget}] / [\text{Total Forecasted Demand}]$. Monthly charge is based on $[\text{Actual monthly BU Demand}] * [\text{Unit Price}]$. Direct charges can also be billed through positive time reporting or projects billed to a specific customer.
- **Basis**, which describes the demand or allocation driver or basis of the billing method.

Performance Measurement Table:

The Performance Management section is optional and can be used to outline the standard by which the practice area monitors and reports performance, the level of service that will be expected to be met at a minimum, and target levels that will be expected to be met or exceeded on negotiated timelines (if applicable).

Responsibilities Table:

The Responsibilities section of the SLA is optional and can be used to provide clarity and ownership of the responsibilities between BSC and the Client Company and/or Identify who is responsible for each activity or decision that is required to provide or receive a service.

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Compliance & Audit Services

Compliance & Audit Services Introduction

The Compliance and Audit Services function encompasses two separate but complementary teams: Compliance & Ethics and Exelon Audit Services.

Compliance & Audit Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
646	Exelon Audit Services	<ul style="list-style-type: none"> Provide internal controls assurance and stewardship as well as operational assurance including, but not limited to: <ul style="list-style-type: none"> Review the reliability and integrity of financial and operating information and the means used to identify measure, classify, and report such information. Review the means of safeguarding assets and, as appropriate, verify the existence of such assets. Review and test established systems of internal control to ascertain whether they are functioning as designed. Coordinate with other control and monitoring functions (e.g. risk management, compliance, CISS, legal, ethics, environmental, external auditors, etc.) and enable control owners and self-assessors. Service offerings include Assurance and Business Enablement (inclusive of Sarbanes Oxley and anti-fraud). 	SVP, Audit Services
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is “trued up” each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	EVP Compliance and Audit
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	EVP Compliance and Audit
953	Compliance & Ethics	<ul style="list-style-type: none"> Provides governance and oversight for Exelon’s compliance with its regulatory and compliance obligations, including working with business units to ensure appropriate controls are designed, implemented, and tested. 	VP, Deputy Gen. Counsel / Chief Compliance and Ethics Officer

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Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> Provides enterprise-wide support and representation of business units on bulk electric system reliability and cybersecurity compliance matters. Oversees and supports the delivery of training and awareness communications across the enterprise on myriad topics implicating regulatory compliance and ethics risks, including emphasis on job performance with integrity in line with ethical expectations. Serves as the primary resource for ethics advice and interpretation of the Code of Business Conduct, including management of Code disclosures and attestations. Maintains a Help Line and a dedicated web portal (hosted by a third-party) for stakeholders to report concerns regarding potential ethical, compliance or legal violations. The Ethics Help Line and web portal offer anonymous reporting options 24-hours a day, every day of the year. Actively monitors the receipt of Help Line reports or other reports of potential violations of the Code of Business Conduct and ensures each report is properly assessed and, when warranted, oversee and complete objective investigations by trained investigators To ensure appropriate corrective action occurs – up to and including employee dismissal – when any wrongdoing is substantiated. Works with the Legal Department to assess legal risks and, when warranted, purchases legal services from third-party sources on behalf of the Client company. 	

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
646	Exelon Audit Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529210	Modified Massachusetts Formula
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method

2021 Exelon BSC Service Catalog

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
953	Compliance & Ethics	923 – Outside Service Employed	Direct - 529200	Modified Massachusetts Formula
			Allocated - 529210	

Responsibilities

Exelon Audit Services provides an independent, objective assurance and advisory activity designed to add value and improve operations. It works to help an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluating and improving the effectiveness of risk management, control, and governance processes. The role and responsibilities of Audit Services is overseen by the Audit Committee of the Board of Directors of Exelon and is part of the Exelon Compliance and Audit organization.

The Compliance and Ethics team manages the Exelon Ethics and Compliance Program, including the Audit Committee's process for receiving and investigating concerns about potential violations of the Code of Business Conduct and coordinates records management, subsidiary management, and the FERC Interlock processes.

Corporate & Information Security Services (CISS)

Corporate & Information Security Services Introduction

BSC Corporate & Information Security Services ("CISS") provides governance and functional oversight for physical and cyber security controls and services.

CISS Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
444	Cyber Security Projects	Exelon CISS Project Delivery Services provides deliverables for projects including planning, design, and implementation of solutions	VP, CSO CISS
445	Physical Security Projects	Exelon CISS Project Delivery Services provides deliverables for projects including planning, design, and implementation of solutions	VP, CSO CISS
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	VP, CSO CISS
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	VP, CSO CISS
930	Business Continuity and Crisis Management	Business Continuity <ul style="list-style-type: none"> Business Continuity Services encompass governance, oversight, support, and perform functions; in addition to an established 'all-hazard' methodology; annual business continuity plan reviews and consultation with all BUs; new business continuity plan development; major exercise design and facilitation; business impact analysis; Business Unit scorecards; LDRPS 	VP, CSO CISS

Service ID	Service Name	Service Description	Service Owner
		<p>system administration; Business Continuity Planners assist with minor updates throughout the year to their respective business continuity plan(s).</p> <p>Crisis Management</p> <ul style="list-style-type: none"> • Crisis Management facilitates effective Business Unit and Corporate response to emergencies; on-call support; maintain and automate Business Unit crisis management notification protocols; support corporate crisis management team; provide situational awareness and monitor adverse conditions; maintain and staff incident command center; administer Company's automated mass notification system (includes support for multiple functions within BGE, CENG ERO, and BSC) and conduct site notification drills; administer quick-ship PC retainer; provision GETS/WPS for BSC. 	
940	CISS Governance, Oversight and Strategy	<p>Overall executive and oversight of all CISS services provided throughout the enterprise to include security Governance and Oversight of the entire Exelon security infrastructure.</p> <p>Strategy and Planning</p> <ul style="list-style-type: none"> • Develop and provide CISS strategic and business planning, operational and financial performance reporting, financial management, project management, contract administrative support, executive and organizational support <p>Awareness and Training and Change Management:</p> <ul style="list-style-type: none"> • Develop and provide CISS communications and change management services; develop and provide security related security awareness and training materials to business units (i.e., Phishing susceptibility, general security awareness, workplace violence, street awareness, security in the field, fraud detection) <p>Policy Governance and Oversight, Security Risk Management</p> <ul style="list-style-type: none"> • Security policies development. Provides stakeholders with an assessment of the adequacy of the organization's security controls to protect the confidentiality, integrity, and availability of assets and information. Strategic/regulatory policy liaison with EEI, AGA, FERC, NERC, DHS, LLEA, and engagement with Exelon executives on external security policy and compliance matters. Support the organization in developing security controls, countermeasures and safeguards that can cost effectively mitigate risk exposure to an acceptable level (includes exceptions analyses). <p>Third Party Risk Management</p> <ul style="list-style-type: none"> • Perform Vendor Security Questionnaires, addressing third party risk management; work with asset owners to develop plans to mitigate or resolve risks. 	VP, CSO CISS

Service ID	Service Name	Service Description	Service Owner
941	Identity and Access Management & Personnel Screening	<ul style="list-style-type: none"> Physical Access provisioning/de-provisioning of employee & contractor physical access to facilities for Exelon non-nuclear BUs. Includes the setup of request workflows, access levels, and approvers groups, as well as encompasses all reporting required for SOX and CIP compliance. Logical Access provisioning and revocation of Active Directory accounts in Exelon domains, as well as cyber access to applications, file shares, and designated email functions in Exelon domains. Additionally, it covers workflow development and approver group creation, conversions for contractors to employees, affiliate transfers, and new large scale application deployment in Exelon domains. Also includes the creation of AD accounts, accounts not assigned to a person, the setup of new locations, and all reporting required for SOX and Critical Infrastructure Protection (CIP) compliance in Exelon domains. Background Investigations - Personnel Risk Assessments (PRA) conducted on candidates for new hire, staff augmentation contractors, employees being promoted to the E05 and above; and on any employee or contractor requiring access to a NERC CIP asset per the requirements of CIP-004 R3. 	VP, CSO CISS
942	Exelon Security Operations Center (ESOC)	<ul style="list-style-type: none"> Alarm Monitoring and Response: Exelon Security Operations Center (ESOC) includes operation of 24/7 monitoring and response for enterprise non-NERC and NERC CIP-related intrusion detection and access control system. 24-hr hub for all emergencies reporting including access control monitoring, security officer dispatch, 911, and other emergency responses; video surveillance including active and passive monitoring; alarm point monitoring including video alarm and duress alarm; and technical project management/implementation. Physical Protection: Security Call Center; Security System Maintenance Tracking; Substation Ingress/Egress Access Tracking. Aligned with ESOC. Enterprise Physical Security Systems Management: Administrator and business owner of non-NERC and NERC CIP-related enterprise security alarm and access management systems. Tuning and calibration of electronic access control points, intrusion detection system, and video surveillance systems, and system administrator for Security Applications incl. CCure, ExcaqVision, ESM, DMP, JIRA. Design, manage, and review access control groups. Business owner of Security Applications, support and coordinate SCP activities to mitigate impacts to BUs. 	VP, CSO CISS

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> PACS Operation (Access Control, Video and intrusion detection hardware and software). PACS System enhancements - above and beyond compliance innovations. NERC Ancillary Systems Support (i.e. eKey, ACAS, IT Server and Network. PSZ and LPAP), physical security control implementation. Provide BUs with support when new or redesign of non-NERC security systems (intrusion detection, electronic access control, video surveillance systems) are required. Includes managing design, installation, integration, and ESOC acceptance and turnover testing. Service includes providing technical details/scope of work for RFPs. 	
945	Cyber and Information Security Services	<p>Cyber Defense Operations</p> <ul style="list-style-type: none"> Provides proactive and near real-time monitoring of security risks for IT, ICS and other OT Systems. This function receives alerts from a variety of defense mechanisms such as web and email filtering, anti-virus protections, custom rules and signatures, and then prioritizes these alerts for analysis. Key sub-functions include: System Engineering is dedicated to ensuring the operation of cybersecurity monitoring systems. Systems Engineering's primary area of focus is Endpoint (AV) protection, Security Monitoring Logging and ingress/egress Intrusion Protection System/Intrusion Detection System implementation. Cyber Threat Intelligence (CTI) provides proactive and predictive indications and actionable intelligence by utilizing information from federal, state, local and open source entities to the following: <ul style="list-style-type: none"> Cybersecurity Monitoring– Provide indicators of compromise (IOCs) gleaned from available reporting for inclusion into network defenses Incident Response – After vetting intelligence, CTI analysts work alongside forensic team members during investigations Forensics – As requested, CTI analysts work alongside forensic team members during investigations Engagement with Federal Agencies (FBI, DHS, E-ISAC, etc.) – when an investigation is completed or new information that is deemed shareable is made discovered, the CTI analyst will share the information to various Cyber Intelligence groups <p>Incident Response</p> <ul style="list-style-type: none"> Primary objective is to respond to incidents in a methodical manner following these phases: (1) Detect, (2) Contain, (3) Eradicate, (4) Recover, (5) Post Incident Analysis. Incident Response is the escalation point for incidents identified by Monitoring and is responsible for handling any issues that necessitate further investigations. 	VP, CSO CISS

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> Engages in proactive threat hunting, reviewing data from CSOC and ESOC tools looking for advanced threats. Routinely prepares for responding to cybersecurity and physical security incidents by planning and executing drills, hosting Lunch & Learn information sessions, attending technical training, and cross training with other members of the team. <p>Cyber Security Architecture and Engineering</p> <ul style="list-style-type: none"> Oversee and maintain system and application controls to protect unauthorized access, disclosure, modification and deletion of information. Key activities include: Integrate cybersecurity architecture requirements and controls into the Exelon System Development, Project Management, and Procurement Lifecycles Establish repeatable enterprise cybersecurity architecture templates and design standards Incorporate cyber security requirements from legislation, directives, policies, regulations, standards, best practices, and relevant guidance into enterprise cyber security architecture and engineering templates and solutions Conduct cybersecurity risk assessments on new projects to ensure requirements are established and maintained throughout the project lifecycle Provide cybersecurity expertise to the ICS/SCADA and other Operations Technology (OT) systems used to support reliable operations for Exelon's generation, electric operations, gas operations, and customer operations functions Supervise changes in software, hardware, facilities, telecommunications and user needs to ensure security is maintained Provide NERC CIP program support to registered entities in the development of RSAWs, Self-Assessment and Certification process, audit preparation/presentation, and mitigation plan development and implementation for OT assets Provide guidance and support to protect systems that support flight operations, logistics, and maintenance activities from compromise, including supply chain considerations. <p>Cyber Vulnerability Detection & Management</p> <p>Vulnerability Management: Performs risk-driven vulnerability assessments of Exelon's key Electronic Information Assets, identifies vulnerabilities, and tracks remediation. Key activities include:</p> <ul style="list-style-type: none"> Inform and work with Security Patch Administrators regarding identifying and analyzing appropriate security patches · Perform rotating weekly vulnerability scans of all EIA in 	

Service ID	Service Name	Service Description	Service Owner
		<p>Exelon's major datacenters, identify vulnerabilities, identify asset owners, and track remediation</p> <ul style="list-style-type: none"> • Monitor security advisories for vulnerabilities in security patches • Communicate critical patch information, as necessary, to all appropriate stakeholders • Review security configurations on Electronic Information Assets • Review proposed changes to the existing firewall rule base, assess the change for risk and approve/reject requests <p>Cyber Security Services</p> <p>The Digital Forensics Team manages the collection and analysis of electronic evidence to help form a better understanding of an incident or investigation, followed by the reporting of those findings in a clear, concise manner. Incidents generally refer to cyber intrusions, while investigations generally refer to inquiries from Legal or HR. Throughout the investigation process, steps are taken to prove evidence is NOT modified in any way by the investigator or tampered with by others.</p> <p>Systems Support Team provides internal support to CISS cybersecurity monitoring and response infrastructure (i.e., intrusion prevention systems, security information and event management systems)</p>	
946	CISS Executive Security & Transportation	Administers and carries out the executive protection program, responsible for planning security surrounding official functions, 24/7 emergency response and secure transportation of executives as assigned.	VP, CSO CISS
947	CISS Physical Client Services	<p>CISS Physical Client Services functions are performed for Generation BU, Commercial BU, and Corporate BU.</p> <p>Security Site Assessments (SVAs): Security (threat/risk) assessment, findings, and remediations of facilities and critical operating processes. Generation's Security Assessments work includes Dam Sector Compliance and security measures to ensure compliance with Hydro FERC standards, and CFATS (Chemical Facilities Anti-Terrorism Standards) compliance and development of security plans to ensure compliance with chemical of interest (COI) security regulatory standards.</p> <p>Investigations: Includes the key functions of Investigations. Investigations: Partnering with HR, Legal, Audit and BUs to provide objective and independent reviews of allegations or concerns.</p>	VP, CSO CISS

Service ID	Service Name	Service Description	Service Owner
		<p>The methodology is established for completing analytical documentation & forensic reviews, conducting interviews, and providing detailed investigative reports to management.</p> <p>Personnel Security / Non-Investigative Client Services: Includes the key functions of:</p> <ul style="list-style-type: none"> • Training: Develop and implement annual In-Service Training to ensure adherence with the Exelon Use of Force and Firearms Policy. Provides training, knowledge and equipment to those who may be tasked with the responsibility of responding to an unexpected medical emergency or critical incident which contributes to the safety and security of Exelon employees and assets. The program provides a tactical-level training platform for proprietary security personnel, in particular, those who are required to carry a firearm. Also, develop and facilitates Workplace Violence Prevention Program: assessments, training, and response to mitigate the potential effect of any allegation or adverse act. • Guard Force Deployment: deploys uniformed armed and unarmed contract Security Officers and/or Off Duty Law Enforcement at various locations throughout the enterprise to perform both routine and emergency security duties. • Security personnel maintain a robust liaison program with a wide spectrum of Law Enforcement and Security-related agencies. These relationships and memberships provide Exelon with timely security intelligence reports or threats and assists management with valuable benchmarking data. 	
949	CISS NERC CIP Compliance	<p>CISS NERC CIP Services – Physical: CIP-006 Program Development and Maintenance; Regulatory NERC Audit Support. PSP Preventive and Corrective Maintenance efforts and documentation; Event Response; BU self-assessments and self-certifications; Investigation/evidence collection efforts, corrective actions, mitigation plans; NERC physical security training development and delivery; Management model documentation and maintenance.</p> <p>CISS CIP Assurance Services – Cyber: Enterprise Standard Owner (ESO): Programmatic ownership of the CIP- 004, -006, -008 CIP standards for the Enterprise, perform control obligations and oversee performance by BUs; drive continuous improvements; drive collaboration to define standard approach to meet operational and compliance requirements (Exelon Compliance Review Team (CRT))</p>	VP, CSO CISS

Service ID	Service Name	Service Description	Service Owner
		<p>Security Control Functions: Perform operational security control obligations on behalf of the Registered Entities; establish and implement internal controls for Security Control Functions to reduce security and compliance risk; provide guidance and support on implementing security control functions for new/upgrade projects; collect, review and approve performance evidence; represent Security Control Functions as Subject Matter Experts during regulatory audits.</p> <p>CISS Owned NERC Assets (CIP-002 obligations): Maintain in-scope CIP Cyber Assets as compliant with the requirements (patching, baseline management, etc.).</p> <p>Other regulatory support (incl Defense Federal Acquisition Regulations compliance)</p>	
936	Intelligence and Threat Analysis	<p>Security Intelligence Services provides intelligence gathering and analytical services across the enterprise. This includes analysis of cyber and physical threats as well as tracking of special events and threats to determine the potential impact and development of mitigation strategies.</p> <p>Security Awareness and Analytical Training on demand includes the development and delivery of security-related training addressing common cyber threats, requested reports and special event and analytical project support.</p> <p>Foreign Travel Program Management provides Security Services for international travelers to include tracking of employees worldwide, emergency alerts to employees, a hotline for international travel issues as well as political and medical emergency extraction services.</p>	VP, CSO CISS
924	As Requested CISS Projects	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	VP, CSO CISS

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
444	Cyber Security Projects		Direct - 529350	Time and Materials

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
		FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Allocated – 529360	Cost Causative Method
445	Physical Security Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529350	Time and Materials
			Allocated – 529360	Cost Causative Method
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated – 529610	Total Service Billings
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct – 529700	Time and Materials
			Allocated - 529710	Cost Causative Method
930	Business Continuity and Crisis Management	923 – Outside Service Employed	Direct – 529350	Time and Materials
			Allocated – 529360	Modified Massachusetts Formula
940	CISS Exec Governance and Oversight and Strategy	923 – Outside Service Employed	Allocated – 529360	Modified Massachusetts Formula
941	Identity and Access Management and Personnel Screening	923 – Outside Service Employed	Allocated – 529360	User ID logins or # of employees
942	Exelon Security Center Operations (ESOC)	923 – Outside Service Employed	Direct – 529350	Time & Materials
			Allocated – 529360	Alarm Points Monitored
945	Cyber and Information Security Services	923 – Outside Service Employed	Allocated – 529360	Modified Massachusetts Formula or % of Total IT Infrastructure Billings
946	CISS Executive Security & Transportation	923 – Outside Service Employed	Allocated – 529360	Modified Massachusetts Formula
			Direct – 529350	Time & Materials
947	CISS Physical Client Services	923 – Outside Service Employed	Direct – 529350 for Generation, Commercial	Time and Materials
				Modified Massachusetts Formula

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
			Allocated – 529360 for Corporate Svcs	
949	CISS NERC CIP Compliance	923 – Outside Service Employed	Allocated – 529360	NERC CIP Registered Access Controlled Doors or NERC registered critical IT assets
936	Intelligence and Threat Analysis	923 – Outside Service Employed	Allocated – 529360	Modified Massachusetts Formula
924	As Requested CISS Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529350 Allocated – 529360	Time and Materials Cost Causative Method

Responsibilities

Corporate and Information Security Services

Task / Responsibility	Exelon BSC CISS	Client Company
Report all CISS related concerns to the Exelon CISS Center.		X
All Enterprise physical access control systems must be connected to the ESOC at the direction of Corporate and Information CISS Services.		X
CISS must be notified of all foreign travel on behalf of Exelon, this notification occurs automatically when utilizing approved travel		X
CISS for Corporate Events shall be coordinated through Corporate and Information CISS Services.	X	
CISS shall provide materials to support training for Violence in the workplace and other CISS related topics as requested.	X	
CISS system design changes or requests for changes will be coordinated by CISS.	X	
All costs for new physical CISS equipment or systems, as well as repairs or maintenance to those systems or equipment shall be borne by the OPCO.		X
All costs for armed or unarmed guards shall be borne by the business unit requesting this service.		X

Corporate and Information Security Services Performance Metrics Table

See 2020 CISS Business Plan for performance metrics.

Corporate Affairs

Corporate Affairs Introduction

Corporate Affairs' role is to protect and enhance Exelon and OpCos' reputations; foster a strong corporate character based on purpose, culture and values; build, manage and balance the interests of multi-stakeholder relationships; and serve as strategic business partners and trusted counselors to leaders. To maximize our impact and cost effectiveness, we focus our team and resources on strategic priorities and data-driven campaigns that advance Exelon and the OpCos' business and policy goals.

Corporate Affairs Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
668	Corporate Affairs Operations	<p>External: Management of external communications strategies and tactics on behalf of the parent company, Exelon Corporation, including</p> <ul style="list-style-type: none"> • media relations; • issues and crisis management; • executive communications; • branding, marketing and advertising; • digital and social media content and channel management; <p>Internal: Management of internal communications strategies and tactics on behalf of Exelon to all employees including:</p> <ul style="list-style-type: none"> • Developing research-based strategies, direction and content for employee communications. • Creating and distributing company-wide communications such as leadership communications, road shows/town halls, email notifications, videos, special content sites, and the intranet. <p>Enterprise: Provide strategic communications counsel and support to Exelon operating companies and BSC departments.</p> <p>Informational Advertising: Development and implementation of advertising across traditional (radio, TV, outdoor) and non-traditional channels (digital, social,</p>	<p>SVP, Corporate Affairs, Communications and Philanthropy</p> <p>Director, Marketing, Digital and Brand</p> <p>Director, Media Relations</p> <p>Director, Internal Communications</p>

Service ID	Service Name	Service Description	Service Owner
		<p>terrestrial/streaming radio and audio) for Exelon Corporation and the Operating Companies to educate/inform customers and other audiences.</p> <p>Promotional Advertising: Development and implementation of advertising across traditional (radio, TV, outdoor) and non-traditional channels (digital, social, terrestrial/streaming radio and audio) for Exelon Corporation and the Operating Companies to educate/inform customers and other audiences.</p>	
611	Corporate Contributions	Governance, strategic and tactical management of Exelon Corporation's charitable contributions, sponsorships, employee volunteer program, and associated internal communications activities designed to benefit the customers and communities that Exelon serves and enhance Exelon's corporate reputation.	VP, Corporate Relations
644	Lobbying & Influence Public Opinion	<ul style="list-style-type: none"> Lead public affairs and advocacy campaigns in support of key federal and state policy goals Oversight of advocacy digital and social tools, campaigns and strategy 	Director, Public Advocacy
833	BSC Revenue Adjustment	<ul style="list-style-type: none"> The difference between actual cost and revenue from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings 	SVP, Corporate Affairs, Communications and Philanthropy
733	BSC AV- Field Photography	<ul style="list-style-type: none"> Field Photography Studio Photography Photo Printing Digital Retouching File Management. <p>Services that are requested outside of standard business hours (8am – 5pm Local Time), will have overtime billed as an As Requested service.</p>	Director, Marketing, Digital and Brand
738	BSC AV - Creative Media and Video Services	<ul style="list-style-type: none"> Video production, including conceptualization and production of videos for employee communications, training, safety awareness, presentations, and TV and radio marketing Coordination of freelance photographers, videographers and other talent. Field and studio photography, printing and retouching File Management <p>Examples of jobs: video production; flash/multimedia production; photography</p>	Director, Marketing, Digital and Brand

Corporate Affairs

Service ID	Service Name	Service Description	Service Owner
		Services that are requested outside of standard business hours (8am – 5pm Local Time), will have overtime billed as an As Requested service.	
665	BSC Corporate Affairs As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	SVP, Corporate Affairs, Communications and Philanthropy

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
668	Communications Operations	930.1 – General Advertising Expenses 923 – Outside Service Employed (Communications Operations)	Direct - 529100	Time and Material
			Allocated - 529110	Modified Massachusetts Formula
			Allocated - 529110	Modified Massachusetts Formula
611	Corporate Contributions	426.1 - Donations	Direct - 529100	Time and Material
			Allocated - 529110	Modified Massachusetts Formula
644	Lobbying & Influence Public Opinion	426.4 - Exp-civic/political activities	Direct - 529100	Time and Materials
			Allocated - 529110	Modified Massachusetts Formula
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529110	Modified Massachusetts Formula
733	BSC AV- IL Field Photography	923 – Outside Service Employed	Direct – 529100	Time and Materials
			Allocated - 529110	Modified Massachusetts Formula
738	BSC AV - Creative Media and Video Services	923 – Outside Service Employed	Direct – 529100	Time and Materials
			Allocated - 529110	Modified Massachusetts Formula
665		923 – Outside Service Employed	Direct – 529100	Time and Materials

Corporate Affairs

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
	BSC Corporate Affairs As Requested		Allocated - 529110	Modified Massachusetts Formula

Responsibilities

Task / Responsibility	BSC Practice Area	Client Company
Communications Operations		
Identify and analyze client companies' key initiatives and issues	X	
Develop communications strategies and plans in coordination with client companies to support business objectives and drive favorability	X	X
Implement and manage client companies' communications strategies and plans	X	X
Develop internal communications strategies and plans in conjunction	X	
Manage creation, production and distribution of Exelon-wide employee communication vehicles	X	
Provide input, as requested, for Exelon-wide employee communications vehicles		X
Manage content creation, production, publishing and monitoring across Exelon social media channels	X	
Work with IT to develop and manage the governance, strategies and policies that guide content on the internet and intranet	X	
Develop and implement external communications strategy and tactics	X	
Public Affairs		
Lead public affairs and advocacy campaigns in support of key federal and state policy goals	X	
Coordinate activities with Federal and State Government Affairs	X	
Oversight of advocacy digital and social tools, campaigns and strategy	X	
Allocate resources as identified to support public advocacy initiatives	X	X
Informational & Promotional Advertising		
Develop and manage Exelon Corporation's and the Client Company's branding strategy (logo standards and guidelines, documentation templates)	X	
Develop overall Exelon Corporation advertising strategy and approach	X	
Review and approve campaign concepts	X	X
Manage advertising agencies, i.e., creation of campaigns, placement of advertisements and the budget	X	X

Corporate Affairs

Task / Responsibility	BSC Practice Area	Client Company
Approve creative content and implementation of advertising campaigns	X	X
Approve cost of advertising campaigns, including traditional and non-traditional media channels	X	X
Approve selection of new advertising agencies upon termination of contracts	X	X
Corporate Contributions		
Manage Exelon Corporation's corporate contributions and sponsorship program; and the employee volunteer program	X	
Promote the employee volunteer program within the Client Company	X	X
Provide governance and support for charitable contributions, manage the Corporate Citizenship Review Committee process and provide systems and process necessary to track giving across Exelon Corporation	X	
Submit the appropriate contribution requests to the CCRC for review and approval	X	X
Media Production Services		
Identify scope of work and schedule required		X
Develop approach and range of services to meet requested scope of work and schedule	X	
Develop bid (statement for work including items to be produced and estimated price) and timeline (schedule for delivery)	X	
Approve bid and timeline. Supply accounting information		X
Deliver services and production items as per approved bid and agreed timeline	X	

Note: Generation Communications and Corporate Relations services are billed directly to Exelon Generation Company and not subject to the provisions of the SLA impacting the other operating companies. Also, each utility has embedded Communications functions that are directly billed to the respective operating companies.

Performance Measurement

Corporate Affairs Performance Metrics Table

Reference the Corporate Affairs Business Plan for performance metrics.

Corporate Development

Corporate Development Introduction

The Corporate Development Practice Area will provide strategic expertise and governance in the evaluation and execution of merger and acquisition opportunities, evaluate company assets for divestiture opportunities, and provide financial and transactional support to restructuring projects.

Corporate Development Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
641	Corporate Development Services	<ul style="list-style-type: none"> Evaluation, prioritization and execution of acquisition and merger opportunities Evaluation, prioritization and execution of divestitures opportunities Evaluation, prioritization and execution of generation, wind and solar development opportunities Financial and transaction support to restructuring projects 	SVP & Chief Development Officer
909	Development As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	SVP & Chief Development Officer
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	SVP & Chief Development Officer
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	SVP & Chief Development Officer

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
641	Corporate Development Services	923 – Outside Service Employed	Allocated - 529060	Modified Massachusetts Formula
			Direct - 529050	Time and Materials

BSC Corporate Development

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
909	Development As Requested	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Cost Causative Method
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529060	Modified Massachusetts Formula

Performance Measurement

Corporate Development Performance Metrics Table

Reference the Corporate Development Business Plan for performance metrics.

Corporate Strategy, Innovation & Sustainability

Corporate Strategy, Innovation & Sustainability Introduction

The Corporate Strategy, Innovation & Sustainability (CSIS) group provides strategic support for senior leadership; program leadership for Exelon's sustainable growth strategy; and corporate-wide governance, oversight and support for the innovation, environment and safety functions.

CSIS will manage strategic issues of the company, set context for strategic decisions and long-term investments, articulate a corporate strategic plan, and support the development and communication of Exelon's vision, and de-risk opportunities for the business units by leading enterprise-focused technology development adoption. CSIS supports the chief executive officer, board of directors and Executive Committee in identifying and analyzing strategic issues, and coordinates with the business units and various corporate functions to address these issues.

CSIS will provide governance and oversight to ensure that Exelon maintains effective programs for enhancing environmental and safety performance and for complying with all applicable environmental laws, regulations, and meets voluntary environmental and safety commitments; support the implementation of the Exelon corporate environment and safety policies, the Environmental Management System/Safety Management System and Industrial Hygiene (IH) Programs ; perform analysis of strategic environmental/safety/industrial hygiene issues, support the management of specific environmental/safety/industrial regulatory compliance issues that affect multiple operating companies and/or the EBSC, or that are considered significant to Exelon, and provide analysis and advocacy support to Federal Regulatory Affairs and Wholesale Market Policy and Federal Government Affairs and Public Policy on strategic environmental/safety/industrial hygiene regulatory and legislative policy issues, respectively.

Corporate Strategy & Sustainability Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
229	Exelorate Efficiency	<ul style="list-style-type: none"> Coordination and support of the business to accelerate adoption of emerging technologies and business models to drive productivity, efficiency, and cost savings <ul style="list-style-type: none"> Acting as catalysts for emerging technology investigations De-risk business investments to quickly pilot new technology and build a business case for scale Sponsoring and funding pilots with OpCos 	SVP, Corporate Strategy, Chief Innovation & Sustainability Officer

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> ○ Provide an engagement model for pilot execution with governance and oversight ○ Facilitating the Innovation Peer Group, Innovation Working Group and other collaborate with Opco innovation teams ○ Recognizing scaling opportunities ○ Collaborate with different shared services teams such as IT, CISS, Supply to provide a plan to scale. ○ Facilitate process transformations and technology opportunities by conducting ethnographic studies and reviews ● Growing a robust ecosystem of partners <ul style="list-style-type: none"> ○ Establish a network of partners that includes startups, system integrators, product vendors, universities, incubators and venture capitalists to support digital transformation objectives ○ Establish collaboration between OpCos, ecosystem partners and industry leaders to identify and evaluate use case opportunities ○ Continuously evaluate new trends and new product ideas with partners ○ Facilitate Co-Innovation opportunities with partners and create a market for Exelon IP ● Create opportunities to enrich existing talent and augment technology capabilities <ul style="list-style-type: none"> ○ Facilitate technology working groups to support the culture of technology adoption and scale ○ Create lessons learned from pilots and obtain feedback for improvements ○ Facilitate continuous learning programs on emerging technology and identify career growth opportunities 	
232	Exelorate As Requested	<ul style="list-style-type: none"> ● As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors. 	SVP, Corporate Strategy, Chief Innovation & Sustainability Officer
317	Environmental/Safety/IH Services	<ul style="list-style-type: none"> ● Provide independent audits of compliance with environmental, health and safety regulations and Exelon environmental, health and safety policies. ● Conduct audits of environmental, safety & IH management systems which will support continued ISO 14001 certification and conformance with other voluntary standards. 	SVP, Corporate Strategy, Chief Innovation & Sustainability Officer
644	Lobbying & Influence Public Opinion	<ul style="list-style-type: none"> ● Supporting environmental/safety/IH policy and regulatory lobbying activities, including preparation or planning activities, research and other background work that is intended, at the time of its preparation, for coordination with lobbying activities of others 	SVP, Corporate Strategy, Chief

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> Coordinate, and support as necessary, the development of positions, comments, testimony, etcetera for emerging environmental/safety/IH regulatory and legislative policy issues, in support of Exelon advocacy initiatives Communicate Exelon's economic, social and environmental performance through an annual corporate sustainability report, information on websites, speeches, etcetera 	Innovation & Sustainability Officer
654	Corporate Strategy Services	<ul style="list-style-type: none"> Strategic issues analysis and management <ul style="list-style-type: none"> Maintain forward-looking agenda of key issues facing the company Establish ad hoc teams to analyze issues and develop options for response Maintain proactive role in keeping focus "ahead of the curve" Support CEO and Leadership Team to develop key focus areas, agenda and staff support for business meetings Corporate Strategic Planning <ul style="list-style-type: none"> Together with Financial Planning, implement a structured approach to strategic and long-range planning that integrates analysis of strategic issues into the planning process Corporate Strategic plan provides framework for aligning business planning with corporate objectives Organize business content for Board Strategy Retreat Vision, communications of vision and strategy, strategic literacy <ul style="list-style-type: none"> Support senior leadership in defining and articulating a corporate vision Cascade vision through organization, aligning and engaging employees Partner with HR and Corporate Communications to drive strategic business literacy throughout the corporation Provide for communications of key strategic issues by managing bi-annual Leadership Meetings Environmental and Safety Performance Oversight Compile, assess and present recommendations to senior leadership for improving Exelon's environmental and safety performance. Maintain the Exelon GHG Inventory, including third-party verification, in support of publicly communicating Exelon's performance. Develop and publish an annual Corporate Sustainability Report communicating Exelon's performance and plans for improving performance and addressing material sustainability issues. Evaluation of new technology 	SVP, Corporate Strategy, Chief Innovation & Sustainability Officer

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> ○ Lead the Technology Exchange – an enterprise-wide cross-functional coordination on the evaluation of new technologies – and present findings to the Executive Committee ○ Partner with the Operating Companies on the execution of a technology strategy identified by the efforts of the Technology Exchange ○ Establish external relationships and create/manage a platform for collaborative research & development (R&D) efforts and process which deliver robust technology opportunities in a timely manner to support growth. ○ For the Partnership R&D, provide Exelon oversight from conceptualization, formulation and demonstration of the area of development. Coordinate with legal on intellectual property development and protection. ○ Propose and maintain budgets and develop funding and milestone plans for assessing progress and movement to next steps. Report out to CEO regularly on projects and commercialization opportunities, including potential financial benefit analysis ● Driving a culture of innovation across Exelon <ul style="list-style-type: none"> ○ Leveraging a common Exelon innovation methodology, process, toolset and metrics across the enterprise. ○ Administering and participating in Innovation Expos, Dancing w/Startups, Crowd Sourcing Challenges and various other innovation events ○ Rewarding and recognizing employees for their innovative ideas and efforts ○ Celebrating success and learning from those successes or failures ○ Focusing on innovation education that allows for out of the box thinking, forward looking. ● Communications of Innovation vision <ul style="list-style-type: none"> ○ Facilitate the corporate-wide Innovation Peer Group and execute on the defined strategic initiatives ○ Publish a quarterly innovation update report to the executive committee ○ Participate in both internal and external conferences on innovation ○ Facilitate innovation working groups with members from all business units to drive the culture of innovation ● Innovation funding, licensing and contracts <ul style="list-style-type: none"> ○ Oversight of IPG/EGB funding for innovation ○ Innovation platform license for Innovation Central ○ Innovation training (Big Think) 	

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> ○ Accelerator contract for new growth opportunities 	
693	BSC Corp Strat As Req Srvcs	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	SVP, Corporate Strategy, Chief Innovation & Sustainability Officer
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	SVP, Corporate Strategy & Chief Sustainability Officer
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	SVP, Corporate Strategy, Chief Innovation & Sustainability Officer

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
229	Exelorate Efficiency	923 – Outside Service Employed	Direct - 529200	Time and Materials
			Allocated - 529210	Modified Massachusetts Formula
232	Exelorate As Requested	923 – Outside Service Employed	Direct - 529200	Time and Materials
			Allocated - 529210	Cost Causative Method
317	Environmental/Safety/IH Services	923 – Outside Service Employed	Direct - 529200	Time and Materials
			Allocated - 529210	Modified Massachusetts Formula
644	Lobbying & Influence Public Opinion	426.4 - Exp-civic/political activities	Direct - 529200	Time and Materials
			Allocated - 529210	Modified Massachusetts Formula
654		923 – Outside Service Employed	Direct - 529200	Time and Materials

Corporate Strategy, Innovation & Sustainability

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
	Corporate Strategy Services		Allocated - 529210	Modified Massachusetts Formula
693	BSC Corp Strat As Req Srvcs	923 – Outside Service Employed	Direct - 529200	Time and Materials
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529210	Modified Massachusetts Formula
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method

Responsibilities

Task / Responsibility	BSC Practice Area	Client Company
Strategic issues analysis and management	X	X
Corporate strategic planning and Corporate strategic plan	X	X
Vision, communications of vision and strategy, strategic literacy	X	
Environment and Safety Program leadership, coordination and support	X	
Environment and Safety Function governance, oversight and support	X	X

Performance Measurement

Corporate Strategy, Innovation & Sustainability Performance Metrics Table

Reference the CSIS Business Plan for performance metrics.

Corporate Strategy, Innovation & Sustainability

Executives (Includes GCAs)

Executives (Includes GCAs) Introduction

The Executives Practice Area will provide strategy, policy and governance for Exelon Companies to optimize overall shareholder value while protecting corporate-wide interests and allowing business unit autonomy and accountability.

Executives (Includes GCAs) Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
315	Executive Services	<ul style="list-style-type: none"> Office of the President and Chief Executive Officer, Exelon Corporation Office of the Senior Executive Vice President and Chief Strategy Office, Exelon Office of the Executive Vice President and Corporate Operating Officer, Exelon BSC Chairman of the Board/Board of Directors Compensation for Board of Directors 	Executive assistant to CEO/ Executive assistant to Sr EVP Chief Strategy Officer
876	BSC GCA SLA,	Costs incurred for the benefit of the service company as a whole. These costs are allocated as described in the costing section below: <ul style="list-style-type: none"> Interest costs on loans from affiliated companies Interest income earned Depreciation Permanent tax differences Bank fees Support services incurred by EBSC Severance costs Other costs not identifiable to a specific service provider 	Executive assistant to CEO/ Executive assistant to Sr EVP Chief Strategy Officer
855	Other Corporate Charges,		
831	BSC Interest,		
784	BSC Severance,		
832	BSC Taxes		
644	Lobbying & Influence Public Opinion	<ul style="list-style-type: none"> Management services for compliance with federal, state and local campaign finance and lobbying laws, regulations and other policy requirements including relationship management with federal, state and local legislative and regulatory bodies and Administrative agencies Direct lobbying activities (attempting to influence discretionary power of government officials) Supporting lobbying activities, including preparation or planning activities, research and other background work that is intended, at the time of its preparation, for coordination with lobbying activities of others 	Executive assistant to CEO/ Executive assistant to Sr EVP Chief Strategy Officer

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> Coordinate, and support as necessary, the development of positions, comments, testimony, for emerging environmental regulatory and legislative policy issues, in support of Exelon initiatives Communicate Exelon's economic, social and environmental performance through an annual corporate sustainability report, information on websites, and speeches 	
611	Corporate Contribution	Governance, strategic and tactical management of Exelon Corporation's charitable contributions, sponsorships, employee volunteer program, and associated internal communications activities designed to benefit the customers and communities that Exelon serves and enhance Exelon's corporate reputation.	Executive assistant to CEO/ Executive assistant to Sr EVP Chief Strategy Officer
694	BSC Executive As Req Srvcs	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	Executive assistant to CEO/ Executive assistant to Sr EVP Chief Strategy Officer
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	Executive assistant to CEO/ Executive assistant to Sr EVP Chief Strategy Officer
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	Executive assistant to CEO/ Executive assistant to Sr EVP Chief Strategy Officer

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
315	Executive Services	923 – Outside Services Employed	Direct - 529250	Time and Materials
			Allocated - 529260	Modified Massachusetts Formula
876	BSC GCA SLA,	923 – Outside Services Employed	Allocated - 529710	Total Service Billings
855	Other Corporate Charges,			

BSC Executives

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
831	BSC Interest,	923 – Outside Services Employed	Allocated - 529710	Modified Massachusetts Formula
784	BSC Severance,			
832	BSC Taxes			
644	Lobbying & Influence Public Opinion	426.4 - Exp-civic/political activities	Direct - 529250	Time and Materials
			Allocated - 529260	Modified Massachusetts Formula
611	Corporate Contribution	426.1 - Donations	Direct - 529250	Time and Materials
			Allocated - 529260	Modified Massachusetts Formula
694	BSC Executive As Req Svcs	923 – Outside Services Employed	Direct - 529250	Time and Materials
			Allocated - 529260	Modified Massachusetts Formula
904	BSC Costs to Achieve	923 – Outside Services Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
833	BSC Revenue Adjustment	923 – Outside Services Employed	Allocated - 529260	Modified Massachusetts Formula

BSC Executives

Exelon Utilities (Includes Transmission Strategy & Compliance)

Exelon Utilities Introduction

Exelon Utilities is comprised of a small utility-focused corporate governance and oversight function to facilitate collaboration among the utilities to achieve the highest standards of organizational effectiveness, operational excellence, financial discipline and efficiency, customer and stakeholder satisfaction, and NERC Compliance. The departments in Exelon Utilities that promote the collaboration include Utility Strategy & Policy, Transmission Strategy & Compliance (TSC), Utility Oversight, EU Analytics, and Executive Services.

Exelon Utilities (Includes Transmission Strategy & Compliance) Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
656	BSC EU Analytics	<ul style="list-style-type: none"> • Executive Services <ul style="list-style-type: none"> ○ Functional leadership through standardized systems, processes, policies and general oversight in the areas of Utility Analytics Strategy, Business Intelligence & Data Analytics (BIDA) program management, Utility Analytics Oversight and Governance. • Exelon Utilities Analytics Organization Focus <ul style="list-style-type: none"> ○ Strategy, oversight and delivery of the EU Analytics multi-year program ○ Design, establish and maintain EU analytics governance policies (e.g., DAP policies) ○ Develop analytics realization framework and capture / report EU and cross OpCo impacts ○ Inventory and capture OpCo developed analytic use cases and replicate quickly across fleet ○ Develop and execute, with supply partners, domain and data science sourcing execution ○ Support EU IT BIDA team in deploying analytic Northstar tools, investigation of emerging solutions, and platform management ○ Drive data quality, management and stewardship (e.g., tools, processes) ○ Establish and maintain data science and implementation community of practice across EU (e.g., tools, practices, algorithms) ○ Conduct BIDA R&D focused on experimentation with new data sources, new tools / capabilities (e.g., AI, robotics) and identify new use case applications 	VP Utility Analytics, Exelon Utilities

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> ○ Develop and execute analytics talent management, development and culture strategy ○ Conduct external benchmarking, synthesize leading practices, and evolve EU analytics maturity 	
664	BSC Ex Utility Policy & Strategy	<ul style="list-style-type: none"> • Executive Services <ul style="list-style-type: none"> ○ Functional leadership through standardized systems, processes, policies and general oversight in the areas of Utility Strategy & Business Planning, Utility Oversight, Workforce Development, Utility Finance, and Transmission Strategy & Compliance. • Utility Strategy & Policy <ul style="list-style-type: none"> ○ Utility-wide strategy formulation and implementation ○ Regulatory policy/issues alignment and implementation ○ Utility investment and business model strategy ○ Scenario analysis and analytical support to utilities ○ Strategy and management of EU innovation and economic development 	VP, Strategic Planning, VP, Utility Oversight VP, Workplace Development, VP, EU Innovation
952	EU Best Practices/Cont Improv	<ul style="list-style-type: none"> • Provide governance and oversight of the Peer Group structure and management system designed to achieve the following: <ul style="list-style-type: none"> ○ Drive consistency, best practices and innovation in the Core Functions of the Management Model across the utilities ○ Track performance of the Client Utilities regarding KPIs, improvement initiatives, and industry standards ○ Analyze opportunities and develop recommendations on issues pertinent to leadership • Exelon Utilities Infrastructure and Customer Organization focus <ul style="list-style-type: none"> ○ Strategy, oversight and delivery of the infrastructure and customer multi-year programs ○ Design, establish and maintain EU infrastructure and customer governance policies (e.g., data quality policies) ○ Support EU IT team in deploying infrastructure and customer Northstar tools, investigation of emerging solutions, and platform management 	VP, EU Operations, VP, Infrastructure Projects, VP, Special Projects, VP, Safety and Training, VP, Continuous Improvement

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> ○ Support EU Operational Technology Security team in deploying IT infrastructure & security control practices, investigation of emerging solutions, and platform management • Exelon Utilities Safety and Training <ul style="list-style-type: none"> ○ Create and implement innovative strategies and policies for excellence in safety, training and learning programs in the collaboration with the OpCos • Continuous Improvement <ul style="list-style-type: none"> ○ Establish and implement the Continuous Improvement approach and methodology to improve efficiency, effectiveness and value across Exelon Utilities 	
685	BSC NERC Compliance and Security	<p>Services provided by the NSC Office of the Vice President</p> <ul style="list-style-type: none"> ○ Identify and analyze client companies' key initiatives and issues ○ Develop communications strategies and plans in coordination with client companies to support business objectives and drive favorability ○ Provide governance and oversight for NERC Compliance of client companies to support business objectives and drive performance ○ Provide oversight for Security Programs of client companies to support business objectives and drive performance <p>Services provided by the NERC Compliance and Security groups</p> <ul style="list-style-type: none"> ○ Provide governance and oversight for implementation of NERC Reliability Standards and DHS Chemical Facility Anti-Terrorism Standards (CFATS) and partner with the Business Units to ensure compliance. ○ Provide oversight for implementation of EU Physical Security Programs and partner with the Business Units to ensure Compliance to federal and state regulations governing physical Security for electric and gas facilities 	VP, NERC Compliance and Security
944	NERC CIP Program Services	<ul style="list-style-type: none"> • Provide enterprise-wide NERC CIP program and project management oversight to ensure sustained Exelon compliance • Provide consistent NERC CIP program, project and initiative: scope definition, change control, planning, processes and tools, to be leveraged across the enterprise • Develop and monitor common Exelon NERC CIP compliance standards and metrics • Report NERC CIP status, including compliance, program/project progress, issues and risks to Executive leadership and the broader enterprise 	VP, Exelon Utilities IT

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> • Develop and maintain Integrated Program Plan • Manage and mitigate enterprise-wide NERC CIP issues and risks, liaising with Exelon Legal for potential violations and internal compliance inquiries or investigations • Identify and make recommendations on NERC CIP projects, as well as enterprise-wide synergy, integration and automation opportunities, providing budgeting and planning input • Provide input on LRP budgets and strategic planning across the OpCos and business areas • Provide enterprise-wide NERC CIP project/initiative management oversight, including strategic NERC alignment across business areas (e.g., utilities, corporate areas), raising awareness of timing concerns, providing best practices and recommending solutions to issues/risks • Act as a communications and change management center for Exelon NERC CIP stakeholders, driving collaboration and a culture of compliance across the entities' business areas • Engage NERC CIP stakeholders, understand change impacts, and provide training guidance • Understand industry NERC CIP regulatory changes and help prepare Exelon for these, sharing information and impacts with appropriate stakeholders from an internal perspective • Provide quality assurance input on key NERC CIP processes and artifacts, reviewing approach and consistency • Identify, collate and share NERC CIP best practices and lessons learned across the enterprise • Provide an Exelon NERC CIP Knowledge Repository, containing best practices, templates and sample documents 	
591	Transmission Strategy & Planning	<p>Transmission Strategy and Planning leads the development of Exelon Utilities transmission implementation and strategy.</p> <ul style="list-style-type: none"> ○ Coordinate transmission investment strategy across Exelon that address obsolescence, economic development, resilience, and other transmission upgrade programs ○ Align OpCo planning and design standards as a prudent and defensible basis for PJM transmission owner supplemental projects and to support coordinated investment decisions 	VP, Transmission Strategy & Planning, Exelon Utilities

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> ○ Evaluate and employ emergent/non-traditional investment opportunities to address transmission reliability, operation and customer benefits including strategic partner prospects ○ Influence industry policy initiatives to protect and grow Exelon's transmission asset base as well as pursue other revenue creation opportunities ○ Manage Exelon's stakeholder activities with NERC, PJM, NATF, RF and other industry forums ○ Complete all required NERC self-certifications, procedural and standard reviews, comply with applicable standards and monitor FERC filings ○ Assist with developing and executing strategies on transmission rates issues and RTEP cost allocations ○ Compete in competitive transmission proposals under the PJM sponsorship model by developing innovative and effective transmission solutions 	
590	Transmission Operations	<p>Transmission System Operations</p> <ul style="list-style-type: none"> • For the Exelon Utilities' transmission systems, perform Transmission Owner Scheduling, System Control and Dispatch Service functions per PJM Open Access Transmission Tariff Schedule 1A, and fulfill all associated PJM Operating Agreement and PJM Manual obligations of a local transmission control center for Exelon Utilities. • On a 24x7x365 basis, direct the operation of the Exelon Utilities' transmission systems in a safe, reliable, and cost-efficient manner compliant with FERC, NERC, PJM, and state requirements and standards. • Implement SCADA controlling actions and direct Exelon Utility operating company field personnel and other Exelon organizations (i.e. OCC, UComm, IT) in actions needed for the operation of Exelon Utilities' transmission systems. • Perform the function of the TSO Designated Authority (DA) for the Exelon Utilities' transmission systems per Management Model document OP-EU-050003 Lockout Tag Out in accordance with OSHA1910.269. • Monitor Exelon Utilities' transmission systems conditions against established operating reliability limits, and implement actions as required. • Provide system voltage control via directing reactive dispatch of generators in the Exelon Utilities' transmission systems footprint, and adjusting transmission voltage control devices, 	VP Transmission Operations

Service ID	Service Name	Service Description	Service Owner
		<p>and coordinating the operation of distribution voltage control devices with the Exelon Utilities' OCCs.</p> <ul style="list-style-type: none"> • Implement Emergency Procedures to maintain reliability, up to and including directing interruption of customers (load shed). • Assess and direct the response to emergent events on the Exelon Utilities' transmission systems • Coordinate with internal stakeholders (T&S, DSO, C&M, etc.), PJM, neighboring utilities, generators, customers, and other stakeholders as needed to schedule and implement planned facility outages in support of new Capital projects and to enable completion of Preventative Maintenance and Corrective Maintenance work on the Exelon Utilities' transmission systems. • Fulfil obligations of Exelon Utilities' transmission system operations in meeting nuclear plant interface requirements, including but not limited to, those stated in Management Model document OP-AA-108-107-1002. • Fulfil obligations of Exelon Utilities' transmission system operations in meeting all FERC, NERC, DOE, and PJM regulatory and reporting requirements applicable to transmission system operations, including but not limited to demonstrating compliance with directly applicable and PJM Matrix assigned standards. • Develop and implement operating policies and procedures for Exelon Utilities' transmission systems • Develop and maintain the data and displays used in Exelon Utilities' transmission system real time systems, and provide real time business support for these systems, including state estimator and contingency analysis tools. • Manage operational aspects of relationship and interface with PJM RTO, NERC, and FERC for Exelon Utilities. 	
879	BSC Transmission Company Services	<p>Transmission Strategy and Planning team provides analysis to support the regulatory and corporate strategic positions for Exelon and may, as requested, support corporate M&A transmission activities for Exelon.</p> <ul style="list-style-type: none"> • Evaluate transmission commercial development opportunities • Provide analytic support for strategic transmission studies and other initiatives as needed 	VP, Transmission Strategy & Planning

Service ID	Service Name	Service Description	Service Owner
948	EU As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	VP, Exelon Utilities
833	BSC Revenue Adjustment	The difference between actual costs and revenues from billings to Client Companies is trued up each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings	VP, Exelon Utilities
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	VP, Exelon Utilities

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
656	BSC EU Analytics	923 – Outside Service Employed	Direct – 529370	Time and Materials
			Allocated – 529375	Utilities Cost Causative Method
664	BSC Ex Utility Policy & Strategy	923 – Outside Service Employed	Direct – 529370	Time and Materials
			Allocated – 529375	Utility Modified Massachusetts Formula
685	BSC NERC Compliance and Security	560 – Operation Supervision and Engineering	Direct – 529370	Time and Materials
			Allocated – 529375	Utilities Cost Causative Method
833	BSC Revenue Adjustment	923- Outside service employed	Allocated – 529375	Utility Modified Massachusetts Formula
904	BSC Costs to Achieve	923 – Outside Service Employed	Allocated - 529710	Utilities Cost Causative Method
			Direct – 529700	Fully Distributed Costs
944	NERC CIP Program Services	923 – Outside Service Employed	Allocated – 529375	% of critical NERC cyber assets

BSC Exelon Utilities

952	EU Best Practices/Cont Improv	923 – Outside Service Employed	Direct – 529370	Time and Materials
			Allocated – 529375	Utility Modified Massachusetts Formula
590	Transmission Operations	560 – Operation Supervision and Engineering or other applicable transmission FERC accounts	Direct – 529370	Time and Materials
			Allocated – 529375	Peak Load
591	Transmission Strategy & Planning	560 – Operation Supervision and Engineering or other applicable transmission FERC accounts	Direct – 529370	Time and Materials
			Allocated – 529375	Peak Load
879	BSC Transmission Company Services	566 –Miscellaneous Transmission Expenses or other applicable transmission FERC accounts	Direct – 529370	Time and Material Utilities Cost Causative Method
			Allocated – 529375	
948	EU As Requested	923 – Outside Service Employed	Direct – 529370	Time and Materials

Responsibilities

Task / Responsibility	BSC Practice Area	Client Company
Office of the Vice President Transmission Strategy and Compliance		
Identify and analyze client companies' key initiatives and issues	X	X
Develop communications strategies and plans in coordination with client companies to support business objectives and drive favorability	X	X
Implement and manage client companies' strategies and plans	X	X
Provide governance and oversight for Transmission Strategies and NERC Compliance Programs of client companies to support business objectives and drive performance	X	X
Transmission Strategy and NERC Compliance		
Provide Governance and Oversight on FERC Regulations and NERC Reliability Standards and partner with the Business Units to ensure Compliance.	X	X
Provide Support for the development of business unit Transmission Planning Rate Strategies	X	X
Manage interface to PJM, NERC and RFC committees	X	X

Additional Information**Issue Resolution for Transmission Strategy and Compliance****Severity Levels (Client View)**

Severity of Problem	Description
1	Crisis or emergency event that has the potential for an adverse, Exelon-wide impact on corporate reputation
2	Crisis or emergency event that has the potential for adverse impact that is limited to the Client-Company's reputation

End User Problem Response (Service Provider)

Severity of Problem	Response	Resolution
1	VP of TSC will respond, as the event requires.	Complete the execution of the applicable plan
2	Director of Client Companies will respond, as the event requires.	Complete the execution of the applicable plan

Issue Resolution for Utilities

If a particular issue arises concerning any Exelon Utilities services the Vice Presidents can be contacted.

Finance

Finance Introduction

The Finance Functional Area will create collaborative processes between business units on business strategy and financial decisions; align finance functions through a common structure and standard policies, practices and processes; drive cost savings through the elimination of redundant and non-value added work; provide governance and risk management; and provide financial analysis and decision support to our business partners.

Finance Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
684	BSC External Audit Services	Coordinate and support the independent auditor's provision of external audit services, including the audit of annual financial statements, testing of internal controls and the attestation of management's assessment on internal controls, as required by SOX, the review of interim financial statements, statutory audits, and other audit-related services. PricewaterhouseCoopers (PwC) provides the service and the Audit Committee of the Board of Directors of Exelon Corporation is responsible for the selection and oversight of the external auditor.	SVP & Corporate Controller
679	BSC Insurance Services	<ul style="list-style-type: none"> Consulting work including contract reviews Analyze risks and make recommendations to management Administer the purchase of insurance policies Interface with and influence the direction of industry mutual insurers Coordinate and administer first-party claims 	VP, Treasurer
637	Tax Services	<ul style="list-style-type: none"> Federal, state and local tax compliance (including transactional and property tax) Tax Audit and Appeals Tax planning and transaction support Tax accounting and reporting Tax forecasting Tax legislative and regulatory 	SVP & General Tax Officer
636	BSC Accounting Services	<ul style="list-style-type: none"> Accounting, control and reporting policies Technical accounting, control and reporting research and business decision/transaction support 	SVP & Corporate Controller

		<ul style="list-style-type: none"> Accounting monthly/quarterly close services including associated governance and control execution (e.g., account reconciliations) Accounting for pension plans and other postretirement benefits including oversight of the related valuation work External financial reporting and certification process Support and perform applicable aspects of the SOX compliance program Accounting and Transaction processing <ul style="list-style-type: none"> Exelon affiliate intercompany billings Cash Reconciliation Accounts Payable (system) Reconciliations Property, plant and equipment Compensation accounting Payroll and third-party benefit vendors (union dues, 401(k) payments) funding requests Unclaimed Property Administration Debt accounting Property tax accounting Financial systems <ul style="list-style-type: none"> Finance systems and applications administration and operations Finance systems and applications enhancements, design, implementation and change management support Help desk support End-user training and process support SOX systems controls compliance Financial and management reporting and architecture support 	
680	BSC Capital Markets Services	<ul style="list-style-type: none"> Securities Issuance/Financing Financial Derivatives Program Liability Management Evaluation & Execution Dividend Policy Information Reporting Credit metrics – Maintain relationship with ratings agencies to support credit ratings 	VP, Treasurer
681	BSC Cash Management Services	<ul style="list-style-type: none"> Liquidity and credit support Cash management Payment Execution Banking Relationships Information Reporting 	VP, Treasurer

		<ul style="list-style-type: none"> Cash Forecasting, Tracking and Reporting 	
634	Finance Executive Services	Functional leadership through standardized systems, processes, policies and general oversight in the areas of Forecasting, Planning and Project Evaluation, Internal Audit and Financial Controls, Treasury, Accounting and Analysis, Tax, and Shareholder and Investor Relations services. Finance Executive services includes the Exelon Utilities CFO organization. The EU CFO organization provides governance and oversight to the Utility Finance organizations, load forecasting and related services to the Utilities, and business planning and reporting services such as operational benchmarking, KPI and AIP reporting.	SEVP, CFO Exelon
642	Financial Planning & Analysis	<ul style="list-style-type: none"> Exelon Corporation long range planning and annual budgeting BSC long range planning and annual budgeting Management reporting, financial analysis and LE/QMM governance and administration Income Statement, Balance Sheet and Cash Flow forecasting and reporting Financial and economic analysis, and business decision support Variance analysis Business performance reporting and initiative tracking Regulatory Proceeding Support EBSC SLA process governance and oversight Oversees the capital management process, including investment evaluation standards, annual cost of capital and the quarterly capital control process, including projects requiring Exelon corporate approval per the Delegation of Authority (DOA) 	VP, Corporate FP&A
640	Investor Relations	<ul style="list-style-type: none"> Quarterly Earnings Release and Conference Call with Investment Community Investor/Analyst calls Investor Targeting Program Investor/Analyst Meeting/Conference Coordination Internal and External Messaging and Presentation Development 	VP, Investor Relations
786	Finance As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	SEVP, CFO Exelon
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	SEVP, CFO Exelon
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	SEVP, CFO Exelon

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
684	BSC External Audit Services	923 – Outside Service Employed	Direct - 529050	Time and Materials - PwC audit work
			Allocated - 529060	Modified Massachusetts Formula
679	BSC Insurance Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
637	Tax Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
636	BSC Accounting Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
680	BSC Capital Markets Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
681	BSC Cash Management Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
634	Finance Executive Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
642	Financial Planning & Analysis	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
640	Investor Relations	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
786	Finance As Requested	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529060	Modified Massachusetts Formula

BSC Finance

Performance Measurement

Finance Performance Metrics Table

Reference the Finance Business Plan for performance metrics.

Government and Regulatory Affairs & Public Policy

Government and Regulatory Affairs & Public Policy Introduction

Government and Regulatory Affairs and Public Policy's mission is to continue to advance policies, regulatory initiatives and market designs that enhance Exelon's customer relevance and build sustainable shareholder value. Key initiatives focus on bringing value to generation that is clean, affordable, reliable, and resilient. We also pursue policies that foster innovation and enhance the ability of our utilities to offer additional services.

Government and Regulatory Affairs & Public Policy Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
316	Government Affairs Services	<ul style="list-style-type: none"> Executive Direction (Office of Senior Vice President) Strategy development and advocacy related to federal, state and local legislative and regulatory initiatives. Federal, state and regional policy issue management in collaboration with Corporate Affairs Wholesale and retail market development activities ISO/RTO interface Political Action Committee administration and operation Grassroots activities and initiatives Federal, state, regional and local public affairs and plant support activities 	SVP, Govt & Reg Affairs & Pub Policy; SVP and VPs (FGA, FRA, WMD, SGA)
644	Lobbying & Influence Public Opinion	<ul style="list-style-type: none"> Management services for compliance with federal, state and local campaign finance and lobbying laws, regulations and other policy requirements including relationship management with federal, state and local legislative and regulatory bodies and Administrative agencies Direct lobbying activities (attempting to influence discretionary power of government officials) Supporting lobbying activities, including preparation or planning activities, research and other background work that is intended, at the time of its preparation, for coordination with lobbying activities of others Coordinate, and support as necessary, the development of positions, comments, and testimony for emerging environmental regulatory and legislative policy issues, in support of Exelon initiatives Communicate Exelon's economic, social and environmental performance through the annual corporate sustainability report, information on websites, and speeches 	SVP, Govt & Reg Affairs & Pub Policy; SVP and VPs (FGA, SGA)

Service ID	Service Name	Service Description	Service Owner
695	Government Affairs As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors	SVP, Govt & Reg Affairs & Pub Policy
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings	SVP, Govt & Reg Affairs & Pub Policy
904	BSC Cost to Achieve	Costs associated with establishing combined operations as a result of a merger.	SVP, Govt & Reg Affairs & Pub Policy

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
316	Government Affair Services	923 – Outside Service Employed	Direct - 529600	Time and Materials
			Allocated - 529610	Modified Massachusetts Formula
644	Lobbying & Influence Public Opinion	426.4 - Exp-civic/political activities	Direct - 529600	Time and Materials
			Allocated - 529610	Modified Massachusetts Formula
695	Government Affairs As Requested	923 – Outside Service Employed	Direct - 529600	Time and Materials
			Allocated - 529610	Modified Massachusetts Formula
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529610	Modified Massachusetts Formula

Responsibilities

Government and Regulatory Affairs and Public Policy's responsibility is to provide our clients with:

- Advocacy on Federal and Regional Public Policy Issues
- Regulatory Affairs and Compliance
- Political Analysis and Strategic Advice

BSC Government Affairs & Public Policy

- Information and Intelligence
- Timely Updates on Legislative and Regulatory Actions
- Outreach to Elected and Appointed Government Officials
- Legislative Expertise
- Market Development Support
- ISO/RTO Interface
- Market and Business Initiatives and Analytic Support.
- Lobbying and Campaign Finance Compliance and Reporting

Government and Regulatory Affairs and Public Policy activity is cascaded throughout the Exelon organization as information is available. For additional information pertaining to Government and Regulatory Affairs and Public Policy, the Business Unit liaison should be contacted.

Note: State and Local Government Affairs Services are billed directly to Exelon Generation Company and not subject to the provisions of the SLA impacting the other operating companies.

Performance Measurement

Government Affairs & Public Policy Performance Metrics Table

Reference the Government Affairs & Public Policy Business Plan for performance metrics.

Human Resources

Human Resources Introduction

Human Resources (HR) Practice Area centralizes and consolidates HR governance and oversight as well as aligns HR strategies, practices and services with customer and business requirements. The organizational structure allows for the design and implementation of common policies, systems, solutions and processes that will support the strategic objectives of the company, drive high performance and employee engagement, enhance workforce effectiveness, and build a platform for growth through operational effectiveness and superior talent.

Human Resources Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
612	HR Solutions	<p><u>HR SOLUTIONS</u></p> <p><u>Compliance</u></p> <ol style="list-style-type: none"> 1. Manage policies and programs to ensure compliance with external agencies, including I-9, NERC, etc. 2. Governance of on-boarding, off-boarding and cross-boarding processes 3. Governance and oversight of the contractor management process 4. Procurement and management of distribution of statutory compliance notices and postings 5. Establish and maintain the HR records/file management program 6. Provide subject matter expertise for non-compliance/non-mandatory workforce policies 7. Governance and oversight of HR's All Company (AC) and Department Only (DO) management model documents <p><u>HR Technology Strategy and Governance</u></p> <p>The HR Technology strategy group is responsible for the development and implementation of an integrated Human Resources Information Technology Strategy across Exelon Corporation.</p> <ol style="list-style-type: none"> 1. Establish HR technology strategy in partnership with overall IT technology strategy 2. Set and apply HR systems policies, standards, procedures and CISS parameters 3. Develop and submit HR technology content for website and other sites 4. Develop, maintain and govern ServiceNow HR knowledge base 5. Maintenance of ServiceNow HR instance, including configuration of the HR Solutions Hub and HR Services cases <p><u>HR Reporting & Analytics</u></p>	VP, HR Solutions

Service ID	Service Name	Service Description	Service Owner
		<ol style="list-style-type: none"> 1. Completion of annual external benchmarking surveys as required per corporate memberships 2. Support pulling and consolidating governmental and regulatory reporting in partnership with local HR 3. Create and enable employee self-service of standardized HR reporting 4. Support in the creation and automation of ad-hoc HR analysis and reports 5. Development and maintenance of HR dashboards, advanced and/or complex statistical analyses on Exelon data <p><u>Talent Acquisition Operations</u></p> <ol style="list-style-type: none"> 1. Recruit for open positions: <ol style="list-style-type: none"> a. Conduct intake meetings with hiring managers b. Work with sources to develop sourcing strategy based on hiring manager needs c. Manage job postings d. Screen candidates e. Manage interview logistics f. Debrief with hiring managers to confirm selection g. Coordinate testing and assessments h. Prepare and extend job offers i. Administer candidate travel reimbursements 2. Attend workforce development events 3. Coordinate university recruiting relations and intern programs 4. Establish enterprise-wide recruiting and staffing strategies to support operating company hiring forecasts 5. Establish enterprise-wide recruiting programs strategies that help the operating companies achieve their recruiting pipeline development, including but not limited to the engineering pipeline intern program, the military, national diversity and disability strategies 6. Develop and govern common enterprise-wide staffing policies and procedures (partnership between Talent COE and TA Operations) 7. Functional Area Manager of Taleo (ePeople Recruiting and Onboarding) <p><u>Compensation Operations</u></p> <ol style="list-style-type: none"> 1. Support Compensation CoE to prepare Vendor file /feed with compensation data for annual salary surveys with external vendors 2. Act as liaison with salary survey vendor and receive, upload and refresh survey results 	

Service ID	Service Name	Service Description	Service Owner
		<ol style="list-style-type: none"> 3. Review aggregated survey results and compare jobs and ranges for external equity for variation report 4. Oversee job update / evaluation requests and triage job evaluation requests to Comp CoE as needed 5. LTI Processing 6. Stock Ownership review and communication 7. Create/Update Job Codes 8. Compensation Vendor Management (e.g., R&R, Stock plan administration, financial planning, Market Pay, etc.) 9. Update Salary Structures annually 10. Executive Perks/Ayco Administration 11. Revise and review Annual Statements 12. Rate Case Data Support for the utilities 13. Reporting including developing and generating regular, standard reports and running ad hoc reports to meet business needs 14. Special Payment Request processing 15. Administer and Process approved Retentions, tracking retention for repayment obligations 16. AIP Brochure updating and formatting, administering and tracking Quarterly Communication 17. AIP Award Processing and Communication 18. AIP Accrual, Workiva 19. LTI Communication (Vesting Statements and Program Summaries), Reconciliation, Communication 20. Mgmt. Model Policy Updates 21. Working with Finance to update LRP Merit and LTI projections 22. E-People Comp planning communication and System Training for HR and Leaders 23. Govern the enterprise-wide tuition program <p><u>Benefits Operations</u></p> <ol style="list-style-type: none"> 1. Administer benefit programs including Health & Welfare, Flexible Spending Accounts, Health Savings Accounts, Pension Plans (qualified and non-qualified), Defined Contribution plans, STD (STD and SDS for bargained employees), LTD and Life Insurance, and other programs as described in the Service Responsibility Matrix 2. Administer short-term disability (STD and SDS for bargained employees) time entry instructions including coordination with Workers Compensation and specialized instructions for bridged STD cases 	

Service ID	Service Name	Service Description	Service Owner
		<ol style="list-style-type: none"> 3. Manage outsourced benefits administration, including TPAs and insurance vendors 4. Monitor service provided by third party vendors through metrics, benchmarking, and review of annual SOC reports 5. Perform Pension and OPEB related Key Financial Controls 6. Ensure internal controls are in place to safeguard the Company's assets and facilitate the Exelon security (AEF) reviews of new and ongoing vendors 7. Perform audits to ensure processes are performing as designed 8. Manage and deliver annual open enrollment, new hire benefits enrollment, benefits web site, online pension instant estimates, requests for statements of pension, life event changes and initiatives based on business need and process improvement while applying varying benefit eligibility logic 9. Provide specialized benefits services focusing Retirement Counseling for active employees moving through the retirement process, executive severance benefits discussions with executives and survivor benefits specialist assistance for family members in the event of death of an active employee and retirees 10. Administer severance plans based on business needs – produce personalized statements for HR and oversee plan administration, severance pay and benefits based on specific severance plan offering. 11. Administer the Tuition Reimbursement program – providing oversight of the TPA and providing review and direction on exception processing. 12. Provide interactive voice response and web enabled systems to provide information and process employee/retiree transactions 13. Provide Customer Care Representative support to process participant issues and transactions and handle escalated issues 14. Provide research and problem resolution for participant issues and benefit transactions 15. Support Benefits Strategy by implementing plan design and vendor changes 16. Implement benefit offerings for new employee groups as business dictates 17. Partner with Procurement to perform marketplace evaluation for TPA services and insurance providers and selection of benefit administration vendors 18. Support Corporate Development by providing benefits information to support divestitures and acquisitions 19. Oversee and audit payroll and Oracle interfaces for appropriate application of benefit related data 	

Service ID	Service Name	Service Description	Service Owner
		<p>20. Perform compliance function required by ERISA and other various regulations required to maintain qualified status of benefit programs (i.e. pay limits, non-discrimination testing, benefit maximums, etc.)</p> <p>21. Provide Deferred Compensation Enrollment and Administration Support</p> <p>22. Administer Canadian employee benefits (separate Health & Welfare benefits) and the Retirement Saving Plan (employee and employer contributions)</p> <p>23. Administer special employment agreement benefit provisions for Canadian employees working in the Ann Arbor office</p> <p>24. Coordinate with expat employees working in the UK to provide benefit information and enrollment assistance</p> <p>25. Administer UK nationals Peoples Pension Plan enrollment and participation and monthly contributions</p> <p><u>Labor Management</u></p> <p>1. Provide access to LaborSoft, an integrated data management system that enables the company to manage grievance, discipline and performance improvement plan data. The system provides the ability to track data by business unit and also provide reports to help with discipline administration (i.e., comparable instances of poor work performance) to ensure consistency among disciplinary actions.</p> <p>2. Ensure oversight with regards to data integrity</p> <p>3. Conduct training for LaborSoft</p> <p>4. Monthly EIAC reporting</p> <p>5. Benchmarking surveys to other labor relations within utilities</p> <p>6. Continue to improve resources for both the supervisor and employee by leveraging innovative techniques (i.e., develop a mobile app for view CBAs/ESOCs)</p> <p><u>Continuous Improvement (CI)</u></p> <p>Identify and drive operational improvements across HR (HR strategies, organizational design, process, programs, etc.):</p> <p>1. Evaluate the effectiveness of HR strategic initiatives and programs; make recommendations to enhance program impact</p> <p>2. Oversee the design and administration of the Employee Engagement Survey/Pulse</p> <p>3. In partnership with COEs and HR Business Partners, conduct ad-hoc employee research and analysis for enterprise-wide or large-scale initiatives (design, administration, data analysis and reporting)</p>	

Service ID	Service Name	Service Description	Service Owner
		<ol style="list-style-type: none"> 4. Maintain the HR Services Catalog detailing HR services and associated metrics 5. Lead efforts to proactively identify continuous improvement opportunities using performance metrics with HR stakeholders 6. Analyze existing HR processes to identify opportunities to improve efficiency (cost/time), value, impact, and/or experience 7. Maintain and update HR process maps 8. Provide project management services for large scale / strategic HR initiatives; includes coordination of overall project activities, project related change management, communications, and training 9. Plan and deliver communications related to large-scale HR projects 10. Develop and distribute centralized HR communications with a centralized mailbox (e.g. open enrollment, message from CHRO, etc.) 11. Coordinate HR's content for the Corporate Sustainability Report (CSR) & Dow Jones Sustainability Index (DJSI) 12. Provide Change Management/Readiness consultation on HR Change Initiatives 13. Provide direct Change Management/Readiness support for large-scale HR Change Efforts 14. Facilitate HR strategic planning sessions; develop and monitor the HR Business Plan 15. Partner with Finance to ensure the HR LRP is completed and meets HR Transformation commitments; monitor the HR budget throughout the year 16. Serve as the POC for cost savings initiatives 	
882	HR Diversity & Development	<p><u>TALENT ACQUISITION, DIVERSITY & INCLUSION, AND DEVELOPMENT PROGRAMS</u></p> <p>Focus on acquiring, developing, engaging and retaining top talent while fostering a diverse and inclusive work environment. Services include:</p> <p><u>Talent Acquisition Strategy</u></p> <ol style="list-style-type: none"> 1. Govern career site and employment brand including brand collateral, communications and training. 2. Design interview guides, aligned to the Exelon Core Competency Model used across the enterprise for talent selection and development 3. Govern and maintain enterprise wide assessment strategy for individual contributors and leadership; vendor management, design and implementation of programs and processes, reporting and training 4. Govern and oversee relocation policies and relationship with the vendor, NEI 5. Govern all EEI testing practices, including the governing policy; the VP, Talent will serve as the testing executive 	VP Talent Mgmt. & Org. Effective

Service ID	Service Name	Service Description	Service Owner
		<p>6. Manage relationships of enterprise-wide recruiting related vendors, negotiate contracts and reconcile the corporate-level maintenance bills</p> <p>7. Govern and oversee all content related to corporate talent acquisition or the enterprise-wide recruiting function on the HR Services portal</p> <p>8. Develop and govern common enterprise-wide staffing policies and procedures (partnership between Talent COE and TA Operations)</p> <p><u>Talent Management and Leadership Development</u></p> <p>1. Develop enterprise core competencies</p> <p>2. Design organizational development, performance development, talent management, and learning strategies</p> <p>3. Design and maintain organizational development methodologies, processes and tools for succession planning and performance reviews</p> <p>4. Design and maintain oversight of leadership/management development programs and tools</p> <p>5. Design and maintain oversight of employee development programs and tools</p> <p>6. Design and maintain oversight of performance development programs and tools</p> <p>7. Develop leadership training programs/materials with subject matter expertise</p> <p>8. Source leadership training and negotiate contracts, as appropriate</p> <p>9. Manage leadership, organizational development, and learning vendors and consultants</p> <p>10. Deliver Hi-Po programs, as approved, and based on business needs.</p> <p>11. Management, design and maintenance of on-line systems to support above activities (e.g., content on HR services, Management Model, ePeople Talent, Learning Platform)</p> <p>12. Coordination of vendor management, technology enablement and ongoing strategic support and oversight to HR OpCo teams for the following talent assessments for selection and development:</p> <ul style="list-style-type: none"> a. Key Manager and above b. Manager and Front-Line Supervisor c. Individual contributor d. 360s e. Exit interviews f. Stay interviews <p><u>Diversity, Equity & Inclusion</u></p> <p>1. Establish corporate-wide diversity strategies</p>	<p>VP Diversity & Inclusion</p> <p>VP Talent Mgmt. & Org. Effective</p>

Service ID	Service Name	Service Description	Service Owner
		<ol style="list-style-type: none"> Counsel and support executive and business unit implementation of D&I strategies, including business plan integration Communicate corporate-wide D&I messages; provide subject matter expertise in the development of diversity communications (disbursement through Communications group) Provide D&I management support, including education; provide subject matter expertise for diversity training/educational materials and D&I education modules in all leadership development programs (e.g., SDP and Power to Lead) Oversee participation in appropriate D&I external surveys and benchmarking (e.g., DiversityInc, Black Enterprise, HACR, Human Rights Campaign) Develop and support appropriate OpCo D&I council and Employee Resource Group (ERG) activities In partnership with OpCos, corporate relations, supplier diversity, external affairs and recruiting, develop and support D&I outreach (Recruiting, Community, and Vendors) Support development and implementation of D&I metrics and reporting at OpCo and executive levels; monitor/test diversity efforts and alignment with policies and procedures Ensure alignment regarding D&I strategies, goals and results; advise and consult management on diversity issues and lead executive leadership discussions Develop Affirmative Action Plans provide training for HR teams and work with Legal, the OpCos and Practice Areas to respond to AAP audits Prepare and submit EEO-1's and Vets 4212 Reports Support and maintain partnerships with external organizations which support the Exelon overall D&I strategy (e.g., UN HeForShe) <p><u>Ethics Investigations</u></p> <ol style="list-style-type: none"> Intake management of investigations cases triaged by the Ethics Office to HR Investigate potential COBC violation that requires HR investigation Prepare final report and recommendation 	
619	Labor Mgmt	<p><u>LABOR RELATIONS</u></p> <p>The Labor Relations function develops and manages enterprise-wide, as well as business unit specific, strategies in partnership with the senior business leaders. The focus maximizes employee and bargaining effectiveness to achieve greater operating efficiency while advocating fair treatment for all employees based on respect, decency and integrity. It is also an integral part of Labor Relations to serve as the primary conduit between Corporation and Union Leadership, where applicable. These principles will be used to guide dealings with the</p>	VP, Labor & Employee Relations

Service ID	Service Name	Service Description	Service Owner
		<p>unionized workforce and to assist in efforts where eligible employees choose to be non-represented. Services Include:</p> <ol style="list-style-type: none"> 1. <u>Develop and Lead Labor Strategies</u> <ul style="list-style-type: none"> ○ Where a union represents employees, honor contracts and constructively engage the union. ○ Recognize it is critical to our success to have First Line Supervisors who are well informed, well trained and committed to Exelon goals and processes. ○ Develop labor strategies focused at local union perspective while balancing impacts to other union contracts and instances where eligible employees choose to be non-represented. ○ Provide assistance with employee engagement efforts. 2. <u>Consulting / Contract Administration</u> <ul style="list-style-type: none"> ○ Analyze impact of business unit initiatives on employee relations by advising management on labor/employee relations issues; interpretation of collective bargaining agreements, arbitration implications, and strategy formation. ○ Develop and provide training/education to management concerning pertinent CBA matters and other labor relations issues. ○ Respond to union leadership, management and craft employee questions related to labor and other applicable communications. ○ Support discipline/termination consensus calls for represented employees with HR Operations and Legal. ○ Conduit between Corporation and Local/International Union Leadership. ○ Provide labor guidance to Company leadership on cutting-edge labor matters and trends. ○ Provide contract interpretation guidance for line management, including but not limited to management rights, reorganization activities and workforce modifications. ○ Support business unit initiatives within contractual obligations. ○ Administer and lead protocol strategy meetings. 3. <u>Negotiations</u> <ul style="list-style-type: none"> ○ Develop labor relations strategy for negotiations in advance contract expiration and enhance the Company's position at the bargaining table. ○ Comply with the National Labor Relations Act and engagement in good-faith bargaining. 	

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> ○ Use of effective negotiation tactics to achieve Company objectives during bargaining. ○ Prepare all negotiation team members for negotiations and establish negotiations support resources within the Company. ○ Ensure appropriate communications from the pre-contract expiration period the post-ratification periods. <p>4. <u>Grievance/Arbitration Administration</u></p> <ul style="list-style-type: none"> ○ Assist with the resolution and/or advocacy of mid-term contractual disputes on behalf of the companies through the grievance and arbitration procedure. ○ Ensure line management is in the best possible position to contractually answer grievance allegations. ○ Manage grievance activity and assist in arbitration preparation with HR Operations, Line Management, and Legal. ○ Risk assessment and settlement/mediation efforts, where applicable. <p>5. <u>Training/Education</u></p> <ul style="list-style-type: none"> ○ Develop and provide or procure training/education to management, for example, first line supervision orientation, labor relations fundamentals training, Collective Bargaining Agreement interpretation, Employee Standards of Conduct application, post-negotiation updates, and other employee relations counseling and advice for the FLSA non-exempt population. <p>6. <u>Generation Building Trades/Vendor Liaison</u></p> <ul style="list-style-type: none"> ○ Serve as a liaison among Exelon Business Units, Trades Unions (Trades) and Contractor Vendors (Contractors). Efforts are focused on those Trades and Contractors which are part of the Generation Exelon Amendment to the General Presidents Project Maintenance Agreement, as well as general counsel and advice on trade matters with other OpCos. 	
880	HR Compensation	<p><u>HR COMPENSATION</u></p> <p>The Compensation function is responsible for developing corporate-wide competitive total compensation programs that attract, engage, motivate and reward employees for achieving high levels of business performance and outstanding financial results. These programs will be anchored in competitive best practices, aligned with Exelon's pay for performance compensation philosophy and will be flexible to address changing business priorities.</p> <p>Compensation develops, governs, and communicates compensation strategy, policies and programs, ensures all regulatory requirements are met, conducts external benchmarking and</p>	VP, Compensation

Service ID	Service Name	Service Description	Service Owner
		<p>analysis, designs and administers special programs, manages external vendors, and oversees the administration of all salaried employee compensation processes</p> <p>Executive Compensation designs and administers all executive compensation and stock programs and prepares all compensation materials for the Board of Directors' meetings</p> <p>Services Include:</p> <ol style="list-style-type: none"> 1. Market Assessment and Surveys (including selection of survey sources and review of survey participation submissions) 2. Base Salary Range Development (including the survey participation and analysis to determine merit budgets) 3. Base Pay Administration 4. Annual Salary Planning and Compensation Guidelines, including adverse impact review 5. Development of guidelines and approval outside of guidelines for Promotional, Special Increase Recommendations, lateral and demotional adjustments 6. Internal and external market adjustment review and recommendations 7. Incentive design and strategy 8. Annual incentive program: Design, Manage Performance Indicators Approved by a Panel of Senior Officers (KPI Panel), manage AIP appeals approved by the CHRO/CFO 9. Design, administration, training and benchmarking of Short-Term Incentive (STI) program for Constellation Reward and Recognition Program design, communication and administration 10. Compensation Philosophy and Strategy 11. Ensure Regulatory Compliance (e.g., FLSA, etc.) 12. Respond to Legal Inquiries; Special Pay Studies 13. Coordinate Proper Accounting with Finance, including LRP support 14. Support Talent Management Cycle by Providing Guidelines (e.g., Salary Increase decision tree) 15. Cash and Stock Retention Strategies 16. Compensation Consulting / Support <ul style="list-style-type: none"> ○ Responding to compensation issues to support the business needs ○ Review and approval of Retention, project completion and non-standard sign-on bonuses ○ Input on Dow Jones Sustainability Index 	

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> ○ Comp solutions to business issues (e.g., AIP curtailment for ExGen Operating Net Income) ○ Regulatory analysis of utility programs to ensure rate recovery ○ New college grad and intern rates ○ Offer tool creation and maintenance for non-executives ○ Sales compensation benchmarking review and analysis ○ Unique bonus programs (license bonuses, quarterly dispatch bonuses in Utilities). ○ Special payment requesting / approvals ○ Reorganizations (comp consulting and guidance) <p><u>Executive Compensation</u></p> <ol style="list-style-type: none"> 1. Executive Compensation Orientations (VPs+) 2. Annual Executive Compensation Study 3. Officer Compensation Recommendations 4. Executive Annual and Long-Term Incentive Targets benchmarking 5. LTI performance tracking (e.g., LTPCA, LTPP and PShares) 6. Executive Severance Plan Design and Administration 7. Compensation Committee and Board Support (also includes CENG Board) 8. Compensation Disclosures to Comply with SEC Requirements 9. Exelon Proxy and ComEd Information Statement 10. Shareholder Engagement Discussions with top holders and proxy advisory firms 11. Financial planning (AYCO) and reimbursement for using Non-Ayco financial advisors 12. Long-term Incentives ("LTI") LTI Mix, Plan Design, Award Processing 13. Developing and delivering compensation education to all leaders <p><u>Pay Equity</u></p> <ol style="list-style-type: none"> 1. Annual internal analysis to ascertain variance between males: females and males: people of color; external validation of pay equity variances to ensure that there are no systemic variances 2. Partner with HR Ops to review potential adjustments to mitigate any pay equity variances 3. Quarterly D&I reporting 	
622	Benefits Strategy & Design	<p><u>BENEFITS STRATEGY & DESIGN</u></p> <p>Responsible for developing corporate-wide competitive benefit programs that attract and retain employees as well as prepare and protect them for various life events. These programs</p>	VP, Health & Benefits

Service ID	Service Name	Service Description	Service Owner
		<p>are anchored in competitive best practices and will be flexible to address changing business priorities.</p> <p>Benefits develops, governs, and communicates the plans, policies and programs, ensures all regulatory requirements are met, conducts external benchmarking and analysis, designs and administers special programs including certain executive programs, manages external vendors. Executive Compensation designs and administers all executive compensation and stock</p> <ol style="list-style-type: none"> 1. Develop / maintain benefits strategy including health promotion / wellness 2. Design enterprise-wide benefit programs including health & welfare plans, Employee Assistance Program, Tuition Reimbursement, PTO, Back Up Child and Elder Care, Leave of Absence (LOA) including Bonding and Primary Caregiver Leave/Short-term Disability (STD)/Long-Term Disability (LTD), 401(k), pension, retirement and severance. Set policies, procedures, and standards; interpret policies 3. Develop annual plan premiums for health care plans 4. Provide internal and external benchmarking 5. Select and manage benefit carriers and vendors, negotiate contracts with Supply Team 6. Provide governance and oversight over executive benefit programs including SERP and Deferred Compensation. 7. Support financial planning activities including the Long-Range Plan (LRP) 8. Support annual pension and OPEB actuarial valuations nondiscrimination testing, annual benefit plan audits and government filings (i.e. IRS Form 5500, 990, PBGC filings and ACA reporting/filing) 9. Support mergers, acquisitions, divestitures and other corporate actions including due diligence, planning and communication 10. Support labor negotiations as they relate to employee benefits 11. Cost analysis and management including ongoing efforts to reduce costs. 12. Plan administration (including compliance, policy and appeals resolution) 13. Prepare and deliver benefits communications for active and retired employees, including required reporting such as Summary Plan Descriptions (SPDs), and annual compliance notices i.e. Health and Welfare compliance notices, Funding Notices, Fee Disclosure Notice and profit-sharing updates. 14. Provide rate case assistance as it related to benefit costs 	

Service ID	Service Name	Service Description	Service Owner
		<p>15. Provide governance and oversight over benefits administration of all health and welfare and retirement programs, provides oversight of all vendors, as well as the outsourced benefits administrator, supports annual enrollment and addresses escalated issues.</p> <p>16. Support benefit plan Accounting and approving vendor payments</p> <p>17. Consult on international benefits</p>	
625	Occupational Health Services (OHS)	<p><u>OCCUPATIONAL HEALTH SERVICES (OHS)</u></p> <p>OHS manages the health aspects of employee disability cases (including persistent sick leave, Short Term Disability, Workers Compensation, FMLA, etc.), manages required regulatory medical testing (as required by NRC, DOT, OSHA and various other government regulatory bodies), provides workplace clinical services, and manages the data systems for all of the above.</p> <p>OHS activities manage costs by reducing lost time and increasing productivity. Meet the requirements of medical disability plans, Workers' Compensation statutes, and Federal and State legislation and delivery of clinical services to minimize time away from the job. OHS also provides and coordinates emergency on-site health care and manages immunization programs, pandemic planning, etc.</p> <p>Coordinates work related injury and illness care; impacting OSHA Recordable and Lost Time Rates.</p> <p>Services include:</p> <ol style="list-style-type: none"> 1. Establish occupational disability strategy 2. Set occupational disability policies, standards, and procedures 3. Oversee management of disability program including Return to Work Planning 4. Oversee management of FMLA program 5. Implement in tandem ADA and Reasonable Accommodation Process 6. Advice on Incidental Sick Time assisting HR, Labor and Legal with reviewing employee availability, impacting employee productivity 7. Governance and oversight of Exelon's Absence Intake Service including Actec (vendor management) 8. Provide Disability Statistics including diagnosis trending, durations, incidence rates, and Return to Work Data 9. Implement All Company disability and sick time Leave policies including federal, state and local level 10. Provide company-wide guidance on FMLA including supervisor training 	VP, Health and Benefits

Service ID	Service Name	Service Description	Service Owner
		<ol style="list-style-type: none"> 11. Provide second and third opinion FMLA guidance and implementation 12. Provide governance and oversight of the Fit For Work Process; impacting employee availability 13. Manage Local 15's Supplemental Disability Plan 14. Provide guidance to HR/LR, legal, line management, and OHS on regulatory and policy issues 15. Provide Auditing for Licensed Operator and Armed Security Medical Examinations Process 16. Provide NRC Assistance for audits and oversight of NOS audits 17. Testify at grievance, arbitration or other legal hearings on testing and policy related issues 18. Develop and implement nursing OHS training programs 19. Establish policies, procedures, and standards for regulatory medical testing 20. Provide supplemental NP/PA for medical examinations both utility and Nuclear/Power 21. Provide governance and oversight of contract Medical Advisor for impact on STD, Occupational injuries/Illness 22. Provide governance and oversight of contract Medical Advisor for review and approval of regulated medical examinations 23. Provide governance and Oversight of Pre-employment medical examinations 24. Establish policies, procedures, and standards for audit of regulatory testing program 25. Select and manage medical testing-related vendors, negotiate contracts, and reconcile vendor bills 26. Prepare and maintain department budget process, provide billing data for BSC customer billing 27. Prepare for and provide pandemic medical response 28. Coordinate Executive Physical program <p><u>Data Systems Administration</u></p> <ol style="list-style-type: none"> 1. Provide access to an integrated data management system (OHM) that enables the business unit to manage safety data. Also, to provide reports on a monthly basis on disability issues within each business unit. Trending/tracking of data in multi-functional process. <ul style="list-style-type: none"> o Monthly accident reporting o Monthly disability reporting (PIR report) o Trending/tracking of statistical data o Provide Integrated Benefit Institute Disability Benchmarking at a Comparator Level within the United States including SEC (Security Exchange) comparison and Benchmark 	

Service ID	Service Name	Service Description	Service Owner
653	Workers' Compensation Admin	<p><u>WORKERS' COMPENSATION ADMINISTRATION</u></p> <p>The Workers' Compensation team focuses on minimizing the liabilities of our corporate clients by developing solutions for ongoing workers' compensation claims. Workers' Compensation controls claims costs through effective management of indemnity and medical benefits as well as continually strategizing litigation to minimize legal costs.</p> <p>Services include:</p> <ol style="list-style-type: none"> 1. Provide and administer workers' compensation benefits to eligible employees within the guidelines of the various state laws 2. Manage and control lost-time cases and medical-treatment-only cases 3. Direct or monitor medical and vocational rehabilitation of workers' compensation cases, as appropriate 4. Direct surveillance 5. Direct third-party administrator on claim handling and reserving 6. Manage Litigation strategy 7. Coordinate employees' return to work with OHS nurses 8. Communicate compensability decisions to OHS and Safety 9. Facilitate data coordination with finance departments of client companies 10. Work with safety professionals from client companies to ensure prompt accident reporting 11. Prepare and submit all required state reports to continue the privileged status of self-insurance where applicable 12. Review and coordinate with the legal department any potential wrongful discharge, ADA or FMLA issues 13. Provide an annual actuarial report for use by accounting departments of the client companies as well as various industrial accident boards 	VP, Health and Benefits
700	BSC Payroll Processing	<p><u>BSC PAYROLL PROCESSING</u></p> <ol style="list-style-type: none"> 1. Prepare and reconcile Gross to Net Payroll transactions, encompassing on-cycle scheduled payroll processing and off-cycle non-scheduled payroll transactions 2. Process and electronically deposit net pay with full service Direct Deposit 3. Print Payroll Checks and provide electronic access to pay statements and W-2 forms 4. Support of Payroll and related time processing 5. Administer Garnishment and child support payroll deductions and related payments 6. Tax Jurisdiction Registrations 7. Employment Tax Filing for federal, state and local jurisdictions as appropriate for each company 	VP, HR Solutions

Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> 8. Participate and maintain compliance in support of Annual Internal and External Audit and Key Financial Controls 9. Provide support testing resources for Payroll Special Initiatives and Projects requiring payroll involvement 10. Provide oversight and testing participation to patch and database upgrade testing 11. Work collaboratively with HR Technology and HRIT Support to provide details around ongoing system issues and UAT review of resolutions 	
735	HR Services	<p><u>HR SERVICES</u></p> <ul style="list-style-type: none"> 1. Process employee transactions (Hire, Transfers and Terminations) 2. Union Wage Increases and time keeping system transactional support 3. Processing organizational structure changes, as requested 4. Provide oversight of vendor supporting HR-related (except for benefits) questions and address escalated issues. 5. Governance and oversight of HR Services Portal 6. Perform HR Services back-office related work 7. Conduct ePeople system training for HR field employees 8. Transaction support for Onboarding, Employee Data Administration, Position Management, CompensationHR general inquiry support 9. Administer and oversight of PTO benefits 10. Manage Service Awards program 11. I9 governance 12. Process unemployment claims 13. Manage and support Management Model HR document adds/updates 14. Manage Local 15 bid process for ComEd, BSC, and Generation 15. Process candidate reimbursements 16. Process invoices through passport for HR-related services 	VP, HR Solutions
740	BSC HR Solutions Technology	<p><u>BSC HR SOLUTIONS TECHNOLOGY</u></p> <ul style="list-style-type: none"> 1. Provide HR Solutions Technology support including Core HR, Payroll and Talent System training and helpdesk support as well as user query support 2. HR System support includes ePeople Core HR and Payroll, ePeople Comp, eTime, Recruiting & Onboarding, LaborSoft, ePeople Talent and all other HR /Payroll Systems except for the myCareer application 3. Maintain HR Systems CISS, user defined tables and data integrity 4. Provide consulting services for HR Solutions including myCareer 5. Implementation of mass HR Technology system data changes 	VP, HR Solutions

Service ID	Service Name	Service Description	Service Owner
		<p>6. Provide support for applications interfacing with ePeople</p> <p>Requests for support and enhancements will follow a defined intake process and be prioritized against existing work requests. System upgrades and implementations may create block out periods where no new enhancements can be implemented. Efforts requiring supplemental resources to complete and/or backfill employee resources may be billed As Requested.</p>	
787	BSC HR As Requested	As requested, services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	SVP & Chief HR Officer, Exelon
881	HR Leadership Support	Cost associated with SVP HR's governance and oversight of HR Practice Area	SVP & Chief HR Officer, Exelon
657	BSC HR Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total HR Service Billings.	SVP & Chief HR Officer, Exelon
904	BSC Costs to Achieve	Direct Costs associated with establishing combined operations as a result of Exelon M&A activity	SVP & Chief HR Officer, Exelon

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
612	HR Solutions	923 – Outside Service Employed	Direct – 529150	Unit Price - Cost Per Employee
			Indirect - 529160	Employee Headcount
882	HR Diversity & Development	923 – Outside Service Employed	Direct - 529150	Unit Price - Cost Per Employee
619	Labor Mgmt	923 – Outside Service Employed	Direct - 529150	Cost per represented employee or Time and Material
880	HR Compensation	923 – Outside Service Employed	Direct - 529150	Unit Price - Cost Per Employee
622	Benefits Strategy & Design	923 – Outside Service Employed	Direct - 529150	Unit Price - Cost Per Employee

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
625	Occupational Health Services (OHS)	923 – Outside Service Employed	Direct - 529150	Unit Price - Cost Per Employee or Time and Material
653	Workers' Compensation Admin	923 – Outside Service Employed	Direct - 529150	Unit Price - Cost Per Employee
700	BSC Payroll Processing	923 – Outside Service Employed	Direct – 529150	Unit Price - Per paychecks processed
735	HR Services	923 – Outside Service Employed	Direct – 529150	Unit Price - Cost Per Employee
740	BSC HR Solutions Technology	923 – Outside Service Employed	Direct – 529150	Unit Price - Cost Per Employee
787	HR As Requested	923 – Outside Service Employed	Direct – 529150	Time and Materials
881	HR Leadership Support	923 – Outside Service Employed	Direct – 529150	Unit Price - Cost Per Employee
			Allocated - 529160	Employee Headcount
657	BSC HR Revenue Adjustment	923 – Outside Service Employed	Allocated - 529160	Total HR Service Billings
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method

Responsibilities

Task / Responsibility	BSC Practice Area	Client Company
Talent Acquisition / Recruiting		
1. Develop and implement sourcing strategies	X	
2. Candidate screening and recommendations	X	
3. Common interview Guide Support	X	
4. Debrief of interviews and final candidate selection	X	
5. Development and negotiation of employment offer	X	
6. Initiation and monitoring of pre-employment requirements	X	
7. Request for Employee ID	X	
8. Fees related to usage of vendors	X	
9. Enterprise wide vendor management and license fees	X	
10. Deliver behavioral based interview training	X	
11. Support and attend recruiting events	X	
12. Initiation of pre-day 1 on-boarding	X	
Talent Management & Development		
1. Design, deliver and manage leadership and management training programs	X	X
2. Support the identification of appropriate program attendees, their attendance and the follow up to reinforce learning and performance		X
3. Oversight and management of processes, programs and deliverables associated with the talent management & org effectiveness processes (succession planning, performance development)	X	
4. Active participation/support in data collection and action planning relating to the talent management process, including business talent reviews		X
Labor Management		

Task / Responsibility	BSC Practice Area	Client Company
1. The Labor Relations function develops and manages enterprise-wide, as well as business unit specific, strategies in partnership with the senior business unit and corporate leadership. The focus maximizes employee and bargaining effectiveness to achieve greater operating efficiency while advocating fair treatment for all employees based on respect, decency and integrity. It is also an integral part of Labor Relations to serve as the primary conduit between Corporation and Union Leadership, where applicable. These principles will be used to guide dealings with the unionized workforce and to maintain a union-free environment where appropriate.	X ⁽¹⁾	
2. Support strategy and operate effectively within principles of strategy		X ⁽¹⁾
(1) In order for Labor Relations to provide effective training and reporting, the business unit should take advantage of all offered training opportunities and adhere to data entry requirements		
Compensation		
1. Develop/design compensation programs, comply with regulators, consult with business and shareholders	X	
2. Communicate and administer comp programs	X	X
3. Manage market compensation surveys and pay structures	X	
4. Manage annual compensation planning and training	X	
5. Provide pay and incentive guidelines recommendations for employees and recommendations for executives	X	X
6. Design and administer special pay programs	X	X
Benefits Strategy & Design, Governance and Administration		
1. Design benefit strategy to address employee needs while controlling cost	X	
2. Communicate benefit programs	X	
3. Administer plans in compliance with applicable law	X	
4. Compliance, policy, and appeals resolution	x	
5. Support labor relations/negotiations	X	X
6. Monitor, measure and manage vendors responsible for program administration	X	
7. LTD vendor management Note: Many of the benefits offered by Exelon are governed by ERISA. As such, the Company has an obligation to administer its benefit plans in accordance with ERISA and other federal regulations. Exelon Benefits Strategy & Design oversees Exelon's obligations to keep the benefit offerings compliant with the necessary rules and regulations and provides oversight and governance on Benefits Administration.	X	
8. Monitor, measure and manage vendors responsible for program administration	X	

BSC Human Resources

Task / Responsibility	BSC Practice Area	Client Company
9. Provide answers to benefit program questions. Investigate and resolve issues relating to benefits programs. Monitor measure and manage vendors responsible for program administration.	X	
10. Maintain employee and retiree 401(k) benefits records. Provide vendor relation interface with HRIS and benefit vendors.	X	
11. Administration of COBRA program, employee notification, billing, vendor interface, problem resolution.	X	
12. Ensure that the survivor(s) receive applicable benefits due to death of employee, retiree, spouse or child (ren).	X	
13. Flexible Spend Accounts vendor management of and high-level problem resolution – health care, commuter and dependent care.	X	
14. Provide annual open enrollment, maintain employee and retiree health & welfare benefits records. Provide interface with HRIS and benefit vendors.	X	
15. Administer severance plans, produce personalized statements for HR and oversee plan administration based on specific severance plan offering as business dictates.	X	
16. Administration of life insurance program, employee notification, billing, vendor interface, problem resolution.	X	
17. Perform function of General Secretary and administer MBA short term absence program in coordination with IBEW Local 15 and Corporate Employee Health and Benefits. Authorize the issuance of disability benefit payments. Communicate activities to employees, OHS, MBA and Labor Relations.	X	
18. Provide vendor management and high-level problem resolution for Qualified Domestic Relations Orders.	X	
19. Administer pension plans – vendor management, database management, issuance of pension checks, death claims, pension estimates, QDROs and final pension calculations.	X	
20. Manage outsourced benefit administration service providers by monitoring performance guarantee results, data audit and benchmarking.	X	
Note: Many of the benefits offered by Exelon are governed by ERISA. As such, the Company has an obligation to administer its benefit plans in accordance with ERISA and other federal regulations. Exelon Benefits Operations offers expertise in benefits administration and oversees Exelon's obligations to keep the administration compliant with the necessary rules and regulations		
Corporate Diversity		
1. Establish corporate-wide diversity and inclusion strategies	X	
2. Establish business-specific diversity and inclusion strategies		X
3. Develop and coordinate corporate-wide diversity and inclusion activities	X	
HR Technology Strategy and Governance/BSC HR Technology Application Support		
1. Establish HR Technology Strategy	X	

Task / Responsibility	BSC Practice Area	Client Company
2. Set and apply HR systems, policies, standards, procedures, and CISS parameters	X	
3. Develop and submit HR technology content for website and other collateral	X	
4. Request and provide requirements for reports for specific available HR data		X
5. Develop specific business OpCo actions and interventions based on data		X
Occupational Health Services (OHS)		
<i>STD and LTD Case Management</i>		
1. Identification and reporting of employee absence	X	X
2. Administer Medical Disability Certification	X	X
3. Administer referral to Medical Disability Retirement and LTD	X	
4. Transitional Return to Work Program	X	X
5. Coordinate and Oversee Limited Duty cases	X	X
6. Maintain relationships with external clinics for urgent and emergency care for employees	X	X
7. Provide utilization reports on a monthly and as needed basis	X	X
8. Medical Records management	X	
<i>Regulatory Medical Testing Administration</i>		
9. Identify and assist business unit with scheduling mechanism	X	X
10. Implement Testing		X
11. Reporting qualified/not qualified	X	X
12. Maintain medical testing in compliance with Regulatory and Company Policy	X	X
13. Records management	X	
<i>Workplace Clinical Services</i>		
14. Immunization programs	X	X
15. Health Education/Wellness	X	X
16. Executive Health program	X	X
<i>Medical Consulting Services</i>		
17. Provide direction, advice, education and contract management for unique medical issues that affect business units	X	
Workers' Compensation		
1. Report all industrial injuries and diseases within 24 hours of notice		X
2. Provide prompt statistical information to business unit financial departments.	X	
3. Direct third-party administrator (TPA), PMA Group	X	

Task / Responsibility	BSC Practice Area	Client Company
4. Manage lost-time and medical-treatment-only claims to a conclusion	X	
5. Provide Physicians Panel for injured workers' in accordance with Pennsylvania law	X	
6. Resolve claims through mediation and negotiation	X	
7. Direct proper investigation of workers' compensation claims	X	
8. Conduct annual litigation and reserve reviews	X	
9. Provide the business units with annual audited reserves	X	
10. Advise the business units of all catastrophic claims within 24 hours of the event	X	
Payroll Services		
11. On-time, accurate timekeeping and variation input	X	X
12. Support of time collection, labor distribution and validation	X	
13. On-time, accurate processing of regular payroll cycles	X	
14. On-time accurate processing of other employee payments, including Annual Incentive Plan and special awards	X	X
15. Timely notification of additional pay items in the prescribed format		X
16. Tax filings and deposits and government reporting	X	
17. Form W-2 statements and special handling of payroll related items	X	
18. Benefit deductions withholding	X	X
19. Garnishment and child support payroll deductions as directed and related payments to third parties	X	
20. Direct Deposit Services	X	
HR/Payroll Application Support Services– Provide HR/Payroll System training and helpdesk support and user query support		
21. Answer user questions on HR/Payroll System functionality	X	
22. Provide regular updates to user community	X	
23. Provide job aids and input into HR/Payroll System training	X	
24. Requests for special reports and queries	X	
25. Payroll Corrections	X	
HR/Payroll Application Support Services– Maintain HR/Payroll System CISS, user defined tables and data integrity		
26. Define and submit update request for locations, job codes, positions mgmt., etc.		X

Task / Responsibility	BSC Practice Area	Client Company
27. Update location, job codes, companies, position management, etc.	X	
28. Monitor system for irregularities	X	
29. Manage unusual pay rules	X	
30. Audit and maintain HR/Payroll System CISS roles and rules	X	
HR/Payroll Application Support Services– Interface Support		
31. Provide subject matter expertise on Oracle HCM HR data	X	
32. Maintenance and enhancement of Oracle HCM payroll module	X	
HR/Payroll Application Support Services– Development of new functionality & complex data queries		
33. Negotiated packages – priced separately	X	X
HR Service Center		
34. Processing of Union Wage Increases	X	
35. Timekeeping system CISS and transaction support	X	
36. Entry of Employee Profile Changes (Hire, transfer, Terminations etc.)	X	
37. Bid List Management	X	
38. HR general inquiry support	X	

Additional Information

- Exelon HR Operating Model:

Embedded HR

(HRBPs, TMDD)

- Drive business advocacy, strategic partnership, and business specific HR solutions
- Continue to own and deliver HR services related to Talent Planning and Employee & Labor Relations
- Engage CoEs to tailor current HR initiatives and design new solutions to address specific talent and organizational issues

Centers of Excellence (CoE)

- Own development of global HR processes, policies, and programs to drive consistency and monitor success
- Partner with Embedded HR to align on priority areas and tailor HR programs
- Collaborate with HR Solutions on topics requiring related subject matter expertise

HR Solutions (HRS)

- Serve as the primary contact point for most HR Customers
- Provide centralized inquiry support, transaction support, and nonurgent services for majority of HR related requests
- Deliver specialized services and manage operational HR work across HR functions

HR Customers

(Leaders, Managers, & Employees)

- Access HR Services Portal first for their HR needs vs. directly reaching out to HRBPs
- Real-time access to HR knowledge articles on policies and processes and enhanced decision making tools for greater accountability
- Visibility to case status and tracking of support requests and complex HR processes

HR Enabling Technology

- Streamlined Portal Content and Navigation
- Self-Service for HR Transactions
- Candidate Relationship Management (CRM)
- Enhanced Case Management and Workflow

Business Benefits of Exelon's HR Operating Model

1. **Enhanced HR customer experiences** enabled by increased employee and manager self-service access; employees will be able to search for information on Portal and submit/track case requests on ServiceNow
2. **Improved strategic partnership with the business** to add greater value to leaders and managers; HRBPs will have additional capacity through centralization and enhanced self-service, to help perform strategic work
3. **Consistent HR processes & standardized service delivery** will reduce redundancies across OpCos; implementing industry leading HR processes and removal of unnecessary steps will streamline HR services
4. **Increased HR cost-effectiveness & operational efficiency** through a streamlined HR Operating Model; efficiencies across HR will be enabled through centralization, automation and increased HR role clarity
5. **Position HR Organization for scalable future growth** through user-friendly HR technologies and automation; these enabling technologies will provide intuitive experiences and better insights for decision making

Performance Measurement

Human Resources Performance Metrics Table

Reference the Human Resources Business Plan for performance metrics.

Investments

Investments Introduction

The services provided by the Investment Office include:

- Determining the investment strategy and asset allocation of Exelon's pension funds, VEBA post retirement funds and nuclear decommissioning funds
- Hiring / firing investment managers
- Managing daily investment activities
- Investment manager due diligence and monitoring
- Operational and back office activities
- Maintaining a well-diversified investment menu for the Employee Savings Plans

Investments Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
677	Investments Trust-Funded Services	Administration, oversight, and other activities related to management of Exelon's trusts that are funded by the trusts. (Applies to Pension, VEBA, and NDT projects.)	Chief Investment Officer
682	BSC Investments Services	Participate in Exelon governance activities, corporate initiatives, and other activities not funded by the trusts.	Chief Investment Officer
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	Chief Investment Officer
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	Chief Investment Officer
234	Investments As Requested	As requested, services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	Chief Investment Officer

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
677	Investments Trust-Funded Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
682	BSC Investments Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529060	Modified Massachusetts Formula
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
234	Investments As Requested	923 – Outside Service Employed	Direct - 529050	Time and Materials

Performance Measurement

Investments Performance Metrics Table

Reference the Investments Business Plan for performance metrics.

IT

IT Introduction

BSC IT provides standard IT services to support Exelon's businesses. These Services include End-User Support Services, IT Systems Operations Services, and IT Service Delivery. These IT services are provided by a combination of Business Unit Application Delivery and Support Departments, Cloud and Infrastructure Services Department, and Office of the CIO.

IT Service Owners include:

- VP, Office of CIO, providing IT governance, strategy, innovation, and business operations.
- VP, Enterprise-Wide Solutions, providing development and maintenance of both applications used by the BSC Practice areas, and of applications used across the enterprise.
- VPs, Cloud & Infrastructure, providing enterprise data network, PCs, communication tools like email, phones, video conferencing, and infrastructure hosting platforms used by applications.
- VP, IT Generation, providing development and maintenance of applications specifically used by generation business areas of Exelon.
- VP, IT Commercial, providing development and maintenance of applications specifically used by the Wholesale and Retail business areas.
- VP, IT BGE, VP, IT ComEd, VP, IT PECO, and VP, IT PHI, providing development and maintenance of applications specifically used by the utility businesses.

IT Services Table

Service Table (See Appendix A for RxQ Technical Services Table)

KPI Definition Table

KPI	Definition
Service Portfolio KPI	Application service levels, including <u>Business Value</u> (in the <i>Application/ Service Scorecard</i> section) and <u>DR Tier Designation</u> (in the <i>Disaster Recovery</i> section) are listed under the relevant Application/ Service in Application Portfolio Manager (APM). Please reach out to your Service Portfolio owner for specific details.
Project Delivery KPI	90% of IT Projects completed on time, on budget, based on agreement out of Detailed Design, with tolerance of +10%.
IT Governance KPI	IT Governance KPIs are reported on monthly in the CIO Management Review Meeting. Please reach out to your portfolio owner for specific details.

BSC IT

Service ID	Service Name	Service Description	Business Relationship Manager	KPI Type
322	BSC BU Specific IT Projects	Exelon IT Project Delivery Services provides deliverables for IT projects including planning, design, asset acquisition, and implementation of solutions	IT VP (Project Specific)	Projects Delivery KPI
410	Client Services	Client Services cover escalated IT Service Desk incidents related to desktop and laptop support including requests, installation, move, add, change, and/or replacement of desktop PCs/Monitors, the installation of peripherals/memory, loaner support, hardware break/fix, technology refresh, manual patching, desk side support, executive support.	IT VPs, Cloud & Infrastructure	Governance KPI
463	Oracle Support Services	The service provides a comprehensive deal structure that includes perpetual unlimited licenses for Oracle's entire catalog of "on premise" software at a fixed price for use across the Exelon Enterprise.	IT VP, Chief Technology Officer	Not Applicable – PULA Costs
505	Application and Technical Service Delivery - Finance	The service covers general areas of support and support providers. The service scope includes Financials (For Financial Services Group), Business Intelligence Architecture (For Financial Services Group), Technical Infrastructure (For Financial Services Group), Other Applications (For Tax Dept), Treasury Systems, and AP Finance. Detailed list of applications included in Enterprise Finance Portfolio Applications	IT VP, Enterprise Wide Solutions	Service Portfolio KPI

506	Application and Technical Service Delivery - Asset Management	The Asset Management service supports applications used by Utilities Work Asset Management, Generation Asset Management, and Supply Asset Management numerous business processes including those associated with work management, supply chain, design engineering and safety and compliance. The process is known as EAM within BSC and GAM within Generation and is largely driven by the Asset Suite application (Passport).	IT VPs of Enterprise Wide Solutions, Generation	Service Portfolio KPI
507	Application and Technical Service Delivery - HR	Application and Technical Service Delivery - HR is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, cloud services, management, project work, compliance and technical services necessary to enable the HR Function within BSC including Oracle HCM, ePeople Talent, eTime, Compensation, Payroll, and OHS.	IT VP, Enterprise Wide Solutions	Service Portfolio KPI
508	Application and Technical Service Delivery - Hyperion, Informatica & SharePoint	This service covers the enterprise wide use of Hyperion Reporting, Informatica and SharePoint	IT VPs, Enterprise Wide Solutions, Cloud & Infrastructure	Service Portfolio KPI
509	Learning Management Portfolio Application Support	The Learning Management Portfolio service includes all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the Learning Management Portfolio Application (LMS).	IT VP, Enterprise Wide Solutions	Service Portfolio KPI

510	Application and Technical Service Delivery - Corporate Applications	Application and Technical Service Delivery Corporate Application Support service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services, necessary to the BSC practice areas of Corporate Communications, Real Estate, Risk, and Audit. This service also supports the IT needs of the Management Model function	IT VP, Enterprise Wide Solutions	Service Portfolio KPI
547	Application and Technical Service Delivery - Accounting Finance Risk and WS Ops	The WS Ops, Accounting, Finance, and Risk service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the WS Op, Accounting, Finance, and Risk business process.	IT VP of Commercial	Service Portfolio KPI
548	Application and Technical Service Delivery - Asset & Trading Op	The Asset & Trading Op service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the Asset & Trading Op business process.	IT VP of Commercial	Service Portfolio KPI
549	Application and Technical Service Delivery - BGE Home	The BGE Home service is provided to support and maintain application services, which include costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the BGE Home business process.	IT VP of Commercial	Service Portfolio KPI

550	Application and Technical Service Delivery - Billing & Payment Processing	The Billing & Payment Processing service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Billing & Payment Processing business process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
551	Application and Technical Service Delivery - Business Operations	The Business Operations service represents the applications used by Exelon Wind and Exelon Power to support business functions that are not related with the direct operation of generation facilities. Applications included in this service support business processes such as land lease management activities, contact management within Exelon Wind, and processes such as KPI reporting, individual site CISS systems within Exelon Power. Each application in this portfolio includes costs of all projects, infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the application.	IT VP of Generation	Service Portfolio KPI
552	Application and Technical Service Delivery - Chemistry	The Chemistry service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Nuclear to support the Chemistry business process.	IT VP of Generation	Service Portfolio KPI

554	Application and Technical Service Delivery - Customer Care Center	The Customer Care Center service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Customer Care Center business process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
555	Application and Technical Service Delivery - Customer Solutions	The Customer Solutions service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Customer Solutions business process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
556	Application and Technical Service Delivery - Distributed Energy	The Distributed Energy service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the Distributed Energy business process.	IT VP of Commercial	Service Portfolio KPI
557	Application and Technical Service Delivery - End User Services	The End User Services service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the end user services used by ComEd, PECO, BGE, PHI, Power, Wind, Commercial, Nuclear and BSC.	IT VP of ComEd, PECO, BGE, PHI, Generation, Commercial	Service Portfolio KPI

558	Application and Technical Service Delivery - Energy Procurement	The Energy Procurement service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Energy Procurement business process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
559	Application and Technical Service Delivery - Engineering	The Engineering service represents the applications required to support the Engineering business functions for Exelon Power and Exelon Nuclear. This service covers a variety of Engineering functions such as vibration analysis, predictive maintenance and condition-based monitoring (CBM) at Exelon Power and the Waterfall Data Diode, eDNA Data Historian and Engage Maintenance Strategy applications at Exelon Nuclear. Each application in this portfolio includes costs of all the Projects, infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain each individual application.	IT VP of Generation	Service Portfolio KPI

560	Application and Technical Service Delivery - Environmental	The Environmental service represents all the applications required to support Power Environmental business functions. Applications such as Continuous Emissions Monitoring System (CEMS) used for monitoring Power plant emissions for EPA reporting purposes, as well applications to support reporting and environmental NOVs are covered by this service. Each application in this portfolio includes costs of all the projects, infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain each individual application.	IT VP of Generation	Service Portfolio KPI
561	Application and Technical Service Delivery - Infrastructure	The Infrastructure service is provided to support and maintain application services, which include costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the Infrastructure business process.	IT VP of Commercial	Service Portfolio KPI
562	IT Management & Compliance	The IT Management & Compliance service is provided to support and maintain the governance and management of the IT services delivered in ComEd, EWS, PECO, BGE, PHI, Power, Nuclear and CIO.	IT VP of ComEd, PECO, BGE, PHI, Generation, Commercial, Enterprise Wide Solutions	Governance KPI

564	Application and Technical Service Delivery - Mass Markets	The Mass Markets service is provided to support and maintain application services, which include costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the Mass Markets business process.	IT VP of Commercial	Service Portfolio KPI
565	Application and Technical Service Delivery - Legacy Meter Services	The Legacy Meter Services service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Legacy Meter Services business process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
566	Application and Technical Service Delivery - Modeling Valuation and Analytics	The Modeling Valuation and Analytics service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the Modeling Valuation and Analytics business process.	IT VP of Commercial	Service Portfolio KPI
567	Cyber Security	The Cyber Security program drives Cyber Security for application and infrastructure assets.	IT VP of OCIO	Governance KPI

568	Application and Technical Service Delivery - Electric Realtime	The Electric Realtime service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Electric Realtime business process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
569	Application and Technical Service Delivery - Operate & Restore (Gas)	The Operate & Restore (Gas) service is provided to support and maintain application services, which include costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by PECO, BGE, PHI to support the Operate & Restore (Gas) business process.	IT VP of PECO, BGE, PHI	Service Portfolio KPI
570	Application and Technical Service Delivery - Operations	The Operations service represents applications used by Exelon Power, Nuclear, and Wind to support the operations of generation facilities across the Exelon fleet. Applications included in this portfolio perform a variety of functions such as, but not limited to; safety tagging, access to the plant network, and site activity logs. For a complete list of applications supported by your IT Organization under this service, please refer to APM. Each application in this service includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the application.	IT VP of Generation	Service Portfolio KPI

571	Application and Technical Service Delivery - Operations Support	The Operations Support service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used Nuclear and utilities to support those processes which are not covered elsewhere by other "Application and Technical Service Delivery" Services	IT VP of Generation, ComEd, PECO, BGE, PHI	Service Portfolio KPI
572	Application and Technical Service Delivery - Power - C&I	The Power - C&I service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the Power - C&I business process.	IT VP of Commercial	Service Portfolio KPI
573	Application and Technical Service Delivery - Project & Work Management	The Project & Work Management service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support their Project and Work Management processes and by Power to support its Work Management business process.	IT VPs of ComEd, PECO, BGE, PHI, Generation	Service Portfolio KPI
574	Application and Technical Service Delivery - Rad Protection	The Rad Protection service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Nuclear to support the Rad Protection business process.	IT VP of Generation	Service Portfolio KPI

575	Application and Technical Service Delivery - Retail Gas	The Retail Gas service is provided to support and maintain application services, which include costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Commercial to support the Retail Gas business process.	IT VP of Commercial	Service Portfolio KPI
576	Application and Technical Service Delivery - Security	The CISS service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, compliance and technical services necessary to maintain the applications used by BSC and Nuclear CISS.	IT VP of Enterprise Wide Solutions, IT VP of Generation	Service Portfolio KPI
577	Site IT Support	Provide Site IT Support for Nuclear IT Operation and Maintenance. Areas of support are Client Support, Server Administration, Cyber CISS, Infrastructure and Real Time Systems Support	IT VP of Generation	Governance KPI
579	Application and Technical Service Delivery - Training	The Training service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Nuclear to support the Training business process.	IT VP of Generation	Service Portfolio KPI
580	Application and Technical Service Delivery - UCOMM	The UCOMM service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the UCOMM business process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI

581	Application and Technical Service Delivery - Work Control	The Work Control service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by Nuclear to support the Work Control business process.	IT VP of Generation	Service Portfolio KPI
583	Application and Technical Service Delivery - EU Support Services	The EU Support Services is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the following processes: Support Services, Project and Work Management. and any other services offered by Work and Asset Management that is not already covered elsewhere.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
584	Application and Technical Service Delivery - Outage Management	The Outage Management service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Outage Management.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI

585	Application and Technical Service Delivery - Smart Meter Operations	The Smart Meter Operations service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to Smart Meter Operations process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
586	Application and Technical Service Delivery - BI and Data Analytics	The BI and Data Analytics service is provided to support and maintain application services, which include costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI, and Commercial to support the BI and Data Analytics process.	IT VP of ComEd, PECO, BGE, PHI, Commercial	Service Portfolio KPI
587	Application and Technical Service - Workforce & Mobile Technology	Mobile Workforce Tech Services is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the mobile applications used by ComEd, PECO, BGE, PHI to support the following processes: Support Services, Project and Work Management. and any other services offered by Work and Asset Management that is not already covered elsewhere.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
588	Application and Technical Service Delivery - Geospatial	The Geospatial service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Geospatial.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI

589	Application and Technical Service Delivery - Back End Meter Operations	The Back End Meter Operations service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to support the Back End Meter Operations business process of ComEd, PECO and BGE. The applications will cover the functionality required, but not limited, to the transfer of meter and reads related information from Head End systems to back office applications and the processes for remotely connecting or disconnecting meters.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
592	Digital Plant Innovation	This service is comprised of planning, design, and implementation of IT projects that support Digital Plant Innovation.	IT VP, Generation	Project Delivery KPI
663	Application and Technical Service Delivery - Utility of the Future	The Utility of the Future service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services, necessary to maintain the applications used by ComEd, PECO, BGE, PHI to support the Utility of the Future business process.	IT VP of ComEd, PECO, BGE, PHI	Service Portfolio KPI
775	IT Governance	This service is provided to support governance and oversight functions, which include costs associated with IT wide governance functions and includes the Office of the CIO (excluding the Planning function), Cost Optimization, and General Governance of IT.	SVP, OCIO Exelon	Governance KPI
777	TDE&Ops Projects	This service includes the planning, design, and implementation of TDE&Ops projects that are allocated to one or more business units	IT VPs, Cloud & Infrastructure	Project Delivery KPI

854	Application and Technical Service Delivery - Legal Application Support	Application and Technical Service Delivery - Legal Application Support service is provided to support and maintain application services, which includes costs of all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to enable general Legal and Ethics & Compliance department activities including regulatory compliance, records management compliance, and electronic discovery (eDiscovery, legal hold) compliance	IT VP, Enterprise Wide Solutions	Service Portfolio KPI
869	Fleet IT Support	Provide Fleet IT Support for Nuclear IT Operation and Maintenance. Areas of support are Client Support, Server Administration, Cyber CISS, Infrastructure, Site Outage Print, and Real Time Systems Support	IT VP of Generation	Service Portfolio KPI
885	BSC IT Services Rev Adjust	BSC IT Services Revenue Adjustment- "Revenue Adjustment Services" reflects the following "true up" mechanism: The difference between actual cost and revenues from billings to the Client Companies is "trued up" each month by allocating it pro rata to the Client Companies based on their share of IT Total Service Billings	SVP, CIO Exelon	Not Applicable – Financial Adjustment Mechanism
901	BSC Other PA Tech Projects	This service is comprised of planning, design, and implementation of IT projects that support BSC Practice Areas other than Finance or Human Resources.	IT VP, Enterprise Wide Solutions	Project Delivery KPI
902	BSC HR Tech Projects	This service is comprised of planning, design, and implementation of IT projects that support the Human Resources Practice Areas of BSC.	IT VP, Enterprise Wide Solutions	Project Delivery KPI
903	BSC Finance Tech Projects	This service is comprised of planning, design, and implementation of IT projects that support the Finance Practice Areas of BSC.	IT VP, Enterprise Wide Solutions	Project Delivery KPI

904	BSC Costs to Achieve	Costs associated with establishing combined operations because of a merger.	IT VP (Project Specific)	Project Delivery KPI
906	Enterprise Wide IT Projects	This service is comprised of planning, design, and implementation of IT projects related to licensing, upgrade and expansion of technology platforms including Oracle database, SQL Server database, SharePoint, and others.	IT VP, Enterprise Wide Solutions	Project Delivery KPI
933	Office of the CIO Projects	This service is comprised of planning, design, and implementation of IT projects related to the Office of the CIO.	IT VP, Office of the CIO	Project Delivery KPI
943	IT Controls & Compliance Services	Oversees IT Management Model, responsible for the IT Corrective Action Program, NERC CIP spend, and works with IT groups to ensure compliance with SOX, and other compliance obligations as necessary.	IT VP, Office of the CIO	Governance KPI
944	NERC CIP Program Services	Provide enterprise-wide NERC CIP program and project management oversight to ensure sustained Exelon compliance	IT Work and Asset Management	Governance KPI
951	NERC CIP Implementation Costs	<p>The NERC CIP Implementation Program (VIP) is an integrated Program to support the on-going compliance NERC CIP standards. Our Program Team works together across the projects to ensure consistency and full coverage of the NERC CIP standards.</p> <p>Program Support Functions include:</p> <ul style="list-style-type: none"> • Program Integration • Program Management Office (PMO) • Finance • Architecture • Communications & Change Management 	VP, Exelon Utilities IT	Governance KPI

F89	Maximo Support	The Maximo support service includes all the infrastructure, labor, licenses, maintenance, support, management, project work, compliance and technical services necessary to maintain the Maximo Application.	IT VP of Generation	Service Portfolio KPI
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FERC Account and Billing Approach Table (See Appendix A for Technical Services Table)

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Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
322	BSC BU Specific IT Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated – 529560	Time and Materials or Cost Causative Method
410	Client Services	923 – Outside Services Employed	Direct – 529550	Time and Materials
463	Oracle Support Services	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated – 529560	Weighted allocation based on application usage
505	Application and Technical Service Delivery - Finance	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Direct (to BSC Finance) – 529550	Time and Materials
506	Application and Technical Service Delivery – Asset Management	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Allocated (general application maintenance) – 529560 Direct (BU specific instance support) – 529550	Based on Passport users Time and Materials
507	Application and Technical Service Delivery - HR	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Direct (to BSC HR) – 529550	Time and Materials
508	Application and Technical Service Delivery - Hyperion, Informatica & SharePoint	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Allocated – 529560	Cost causative method
509	Learning Management Portfolio Application Support	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Allocated – 529560	Number of LMS users

510	Application and Technical Service Delivery - Corporate Applications	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Allocated – 529560	% of cost attributable to each portfolio
547	Application and Technical Service Delivery - Accounting Finance Risk and WS Ops	923 – Outside Service Employed	Direct – 529550	Time and Materials
548	Application and Technical Service Delivery - Asset & Trading Op	923 – Outside Service Employed	Direct – 529550	Time and Materials
549	Application and Technical Service Delivery - BGE Home	923 – Outside Service Employed	Direct – 529550	Time and Materials
550	Application and Technical Service Delivery - Billing & Payment Processing	923 – Outside Service Employed	Direct – 529550	Time and Materials or Number of Customers
551	Application and Technical Service Delivery - Business Operations	923 – Outside Service Employed	Direct – 529550	Time and Materials
552	Application and Technical Service Delivery - Chemistry	923 – Outside Service Employed	Direct – 529550	Time and Materials
554	Application and Technical Service Delivery - Customer Care Center	923 – Outside Service Employed	Direct – 529550	Time and Materials or Number of Customers

555	Application and Technical Service Delivery - Customer Solutions	923 – Outside Service Employed	Direct – 529550	Time and Materials
556	Application and Technical Service Delivery - Distributed Energy	923 – Outside Service Employed	Direct – 529550	Time and Materials
557	Application and Technical Service Delivery - End User Services	923 – Outside Service Employed	Direct – 529550	Time and Materials
558	Application and Technical Service Delivery - Energy Procurement	923 – Outside Service Employed	Direct – 529550	Time and Materials
559	Application and Technical Service Delivery - Engineering	923 – Outside Service Employed	Direct – 529550	Time and Materials
560	Application and Technical Service Delivery - Environmental	923 – Outside Service Employed	Direct – 529550	Time and Materials
561	Application and Technical Service Delivery - Infrastructure	923 – Outside Service Employed	Direct – 529550	Time and Materials
562	IT Management & Compliance	923 – Outside Service Employed	Allocated – 529560	Cost Causative Method
564	Application and Technical Service Delivery - Mass Markets	923 – Outside Service Employed	Direct – 529550	Time and Materials
565	Application and Technical Service Delivery - Legacy Meter Services	923 – Outside Service Employed	Direct – 529550	Time and Materials

566	Application and Technical Service Delivery - Modeling Valuation and Analytics	923 – Outside Service Employed	Direct – 529550	Time and Materials
567	Application and Technical Service Delivery – IT CISS	923 – Outside Service Employed	Direct – 529550	Time and Materials
568	Application and Technical Service Delivery - Electric Realtime	923 – Outside Service Employed	Direct – 529550	Time and Materials
569	Application and Technical Service Delivery - Operate & Restore (Gas)	923 – Outside Service Employed	Direct – 529550	Time and Materials
570	Application and Technical Service Delivery - Operations	923 – Outside Service Employed	Direct – 529550	Time and Materials
571	Application and Technical Service Delivery - Operations Support	923 – Outside Service Employed	Direct – 529550	Time and Materials or Number of Customers
572	Application and Technical Service Delivery - Power - C&I	923 – Outside Service Employed	Direct – 529550	Time and Materials
573	Application and Technical Service Delivery - Project & Work Management	923 – Outside Service Employed	Direct – 529550	Time and Materials
574	Application and Technical Service Delivery - Rad Protection	923 – Outside Service Employed	Direct – 529550	Time and Materials

575	Application and Technical Service Delivery - Retail Gas	923 – Outside Service Employed	Direct – 529550	Time and Materials
576	Application and Technical Service Delivery - Security	923 – Outside Service Employed	Direct – 529550	Time and Materials
577	Site IT Support	923 – Outside Service Employed	Direct – 529550	Time and Materials
579	Application and Technical Service Delivery - Training	923 – Outside Service Employed	Direct – 529550	Time and Materials
580	Application and Technical Service Delivery - UCOMM	923 – Outside Service Employed	Direct – 529550	Time and Materials
581	Application and Technical Service Delivery - Work Control	923 – Outside Service Employed	Direct – 529550	Time and Materials
583	Application and Technical Service Delivery - EU Support Services	923 – Outside Service Employed	Direct – 529550	Time and Materials
584	Application and Technical Service Delivery - Outage Management & Geospatial	923 – Outside Service Employed	Direct – 529550	Time and Materials
585	Application and Technical Service Delivery - Smart Meter Operations	923 – Outside Service Employed	Direct – 529550	Time and Materials
586	Application and Technical Service Delivery - BI and Data Analytics	923 – Outside Service Employed	Direct – 529550	Time and Materials
587	Application and Technical Service - Workforce & Mobile Technology	923 – Outside Service Employed	Direct – 529550	Time and Materials

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588	Application and Technical Service - Geospatial	923 – Outside Service Employed	Direct – 529550	Time and Materials
589	Application and Technical Service Delivery - Back End Meter Operations	923 – Outside Service Employed	Allocated – 529560	Cost Causative Method
592	Digital Plant Innovation	923 – Outside Service Employed	Direct – 529550	Time and Materials
663	Application and Technical Service Delivery - Utility of the Future	923 – Outside Service Employed	Allocated – 529560	Cost Causative Method
775	IT Governance	923 – Outside Services Employed	Allocated – 529560	% of total IT Service Billings
777	TDE&Ops Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated – 529560	Time and Materials or Cost Causative Method
854	Application and Technical Service Delivery - Legal Application Support	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Direct - 529550	Time and Materials
869	Fleet IT Support	923 – Outside Service Employed	Direct – 529550	Time and Materials
885	BSC IT Services Rev Adjust	923 – Outside Service Employed	Allocated – 529560	% of Total IT Service Billings to each OpCo
901	BSC Other PA Tech Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated - 529560	Time and Materials or Cost Causative Method
902	BSC HR Tech Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated – 529560	Time and Materials or Cost Causative Method (typically % of total headcount)

903	BSC Finance Tech Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated - 529560	Time and Materials or Cost Causative Method (typically Modified Massachusetts Formula)
904	BSC Costs to Achieve	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated – 529560	Time and Materials or Cost Causative Method
906	Enterprise Wide IT Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated - 529560	Time and Materials or Cost Causative Method
933	Office of the CIO Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Allocated - 529560	Time and Materials or Cost Causative Method
943	IT Controls & Compliance Services	FERC Accounting to be determined with FERC Reporting groups during each individual project creation	Direct – 529550 Allocated - 529560	Time and Materials or Cost Causative Method
944	NERC CIP Program Services	923 – Outside Service Employed	Allocated – 529560	% of critical NERC cyber assets
951	NERC CIP Implementation Costs	923 – Outside Service Employed	Allocated – 529560	% of critical NERC cyber assets
F89	Maximo Support	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Allocated – 529560 Direct – 529550	Based on Maximo users Time & Materials

IT as Requested Services Introduction

Periodically, the OpCos may request additional IT project or non-standard IT support services that were not identified during the budget/LRP cycle. These costs will be funded directly by the operations area of the OpCo requesting the incremental project or non-standard support. Note, additional non-standard services may be created depending on what support is requested over the course of the SLA period.

IT As Requested Services Table

As Requested Service Table

Service ID	Service Name	Service Description	Service Owner	Performance Level / Metric with Target
779 (As Requested)	As Requested IT Projects	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	IT VP (Project Specific)	Project Performance

As Requested FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
779 (As Requested)	As Requested IT Projects	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Direct – 529500 or 529550 Allocated – 529560	Time and Materials or Cost Causative Method

Performance Measurement

The performance management section outlines the standard performance metrics across IT Services, the level of service will be expected to meet at a minimum, and target levels that will be expected to be met or exceeded on negotiated timelines (if applicable).

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IT will monitor its service levels and performance using both cost and quality metrics on an on-going basis. IT will facilitate the definition of metrics, provide templates for data input and measurement, and consolidate the inputs to calculate end-to-end process metrics where data is available.

IT will make metrics available to Client Companies and facilitate monthly/periodic meetings with Client Company Business leaders to review metrics and discuss IT performance to service level metrics.

General information covered by performance management and reporting of IT service delivery includes the following:

- Project reporting, including estimated percentage deliverables progress towards completion compared to percent of project spend; key milestones and delays
- Financial reporting on all IT spend associated with Client Company, including budgets, actual costs, and forecasts. Detailed past, current, and expected internal and external audit activity associated with IT that supports Client Company
- Control assessments and analyses of actual events
- Risk assessments, including risks to financial outcomes, risks from personnel changes, risks to successful delivery of projects, CISS risks, audit risks, and other assessments, whether accurately quantifiable or not
- Other issues or concerns as appropriate

The following table outlines the general performance measures for Service Desk and IT Operations Services:

Standard IT Operational Metrics include:

End User Computing	Target
Service Desk Resolution <ul style="list-style-type: none"> • The percentage of calls resolved by the Service Desk without escalation to Level 2 or Level 3. • Calculated by the aggregated number of Service Desk Resolutions completed by the Service Desk divided by the total number of interactions received by the IT Service Desk during the month 	75%
Average Wait Time for Client for Service Desk <ul style="list-style-type: none"> • Data comes from Cisco Call Manager • Includes front-end message 	60 secs

High Business Value Application and Infrastructure Reliability and Availability	Target
<ul style="list-style-type: none"> • MTTR for Major Incidents – Mean Time to Restore is the elapsed time from incident detection by or reported to the ITOC until client service is restored or workaround is in place • Frequency – Number of Major Incident is defined as High Business Value application or Infrastructure not available 	150 mins
	170 Annually

Responsibilities

The BSC IT responsibilities along with the Client Company are different based on the type of service. For example, responsibilities related to the delivery of a personal computer will be different than that of requesting changes to an application, which is owned by Client Company.

The responsibilities are general in nature and not necessarily intended to be an all-inclusive list of responsibilities between BSC IT and Client Company for every aspect of IT service delivery and support. Responsibilities have been grouped by different types, as applicable, and include:

1. End-User Support
2. Application Support
3. IT Project Delivery

Services are requested as follows with the indicated department having primary responsibility:

Service	Primary Organization
End-User Support <ul style="list-style-type: none"> • Desktop Issues, End-User Equipment Requests, General Information, Report System Issues 	TechOps – Service Desk
Access Requests – Access to Applications	Corporate Information CISS Services Access Request Portal
Application Maintenance Requests	EDM Request to Business Unit Application Department
Project Delivery Requests	PPM Request to Business Unit Application Department

Additional Information

Service Desk and Request Fulfillment

End users contact IT Service Desk for support (create an incident) or to request an IT asset or service. The IT Service Desk may be contacted in the following ways:

1. Calling the IT Service Desk (either 1.877.9EXELON (1.877.939.3566)
2. Via the Service Manager Self-Service on-line portal 24x7.
3. Via an email to "IT Support Center" describing the incident or request.

The IT Service Desk provides 7x24 support. Client Services Support Hours are Monday – Friday, 7:30 AM – 5:00 PM, local time to their location, with after-hours support on-call for urgent issues only.

End user incidents (incidents affecting individual user) are assigned a priority based on corporate role:

	Priority		
End User Incident	ELT	VIP	Standard

The following SLAs apply to End User Incidents:

Priority	Escalation	Resolution
Standard	30 minutes business hours	2 Business Days
VIP	30 minutes 24x7	2 hours
ELT	15 minutes 24x7	1 hour

Incidents affecting systems or multiple users will be escalated to the ITOC for coordination and escalation based on a priority which is derived from severity and urgency (see table under Service Operations Support Model).

Requests for an IT asset or service creates an IT Service Request, or 'non-incident'. Service Requests are directed to the appropriate IT service owner for fulfillment. SLAs for service requests are based on the individual service. Requests for services not associated with an operational

issue (e.g. new remote access token, additional space in a home drive) will be processed Monday through Friday 8:00am to 5:00pm, local time to client location.

Service Operations Support Model

IT Operations Services supports a vast variety of technologies in the enterprise computing environment. To do this efficiently and effectively, a standard operations support model is used to drive consistent support and delivery expectations. Applications must be registered in IT's Asset Manager/Application Portfolio Manager database to subscribe to the standard Service Operations Support Model.

TechOps offers three operational support offerings: Full Support, Limited Support, and Data Center facilities Management

- **Full Support** applies to applications where TechOps is providing Infrastructure as a Service (IaaS) support for the application hosting environment. Full support provides event monitoring, incident management, incident communications, problem management, CISS patching, and routine operational maintenance. This applies to both Physical and Virtual devices. Data Center facilities costs are above and beyond this support.
- **Limited Support** applies to applications and infrastructure where TechOps provides monitoring and escalation services but is not responsible for incident resolution and other operational tasks for the equipment. This applies to P/SaaS applications and Opco IT-supported equipment. This includes Event Monitoring, Incident Escalation, Incident Communications, and Problem Management. Data Center facilities costs are above and beyond this support for devices hosted in enterprise data centers.
- **Data Center Facilities Management** applies to applications and infrastructure where equipment resides in our Enterprise Data Centers. These charges cover the costs of space, power, and general network connectivity.

Incidents are prioritized based on Business Value (Urgency) and Impact (Severity). The following table defines Incident priorities for IT Incident Management:

Impact (Severity)	Application Business Value (Urgency)		
	High	Medium	Low

	SEV-1 (Application or Infrastructure Unavailable)	Major	Minor	Routine
	SEV-2 (Application or Infrastructure not performing as expected)	Minor	Minor	Business Hours
	SEV-3 (Non-client impacting proactive system events)	Routine	Routine	Business Hours
	SEV-4 (Informational Alerts)	Business Hours	Business Hours	Business Hours

The following table defines the Incident Management Targets for System Incidents:

Service Level Commitment Details				
	Support Hours	Target Resolution	Status Updates	Level of Effort
Major	24 x 7 x 365	2 hours	2hours	Worked continuously until workaround or resolved

Minor	24 x 7 x 365	8 hours	Open/Close	Escalated 24x7 Maybe deferred until next business day by service owner in off hours
Routine	24x7x365	24 hours	None	Escalated 24x7 Maybe deferred until next business day
Business Hours	Business Hours Monday thru Friday 7AM to 7PM ET	1 Business Day	None	Worked Business Hours Only

Incident Management & Escalation Process Overview

This section provides an overview of the process steps that IT will take to resolve an incident – service not available or performing as expected reported by an end-user or via system events to the IT Operations Center (ITOC). The purpose is to add clarity to the delivery of “Incident Response” of the Standard Operations Support Model. The support workflow for an incident follows a standard process based on support levels of IT Teams, severity/urgency of the incident, and the resolution target. This section also describes how the Client Company management may escalate issues.

The IT Service Desk can be considered **Level 0** support organization. All end user interactions, and any created incidents, are to originate via contact with the IT Service Desk. If the interaction between the end user and the IT Service Desk does not result in resolution of the issue, the interaction ticket is escalated to an incident ticket and transferred to the supporting Client Services team or designated support team for resolution.

Client Services (deskside support) can be considered **Level 1** support organization. Single instances of end user incidents which cannot be resolved by the IT Service Desk are transferred to CSDS as the **Level 1** support team. CSDS are structured by the Operating Company that they support. CSDS are positioned to be the single point of client support and requests for end user tools, such as the PC, telephone, printers. They provide initial contact and desktop support for the most critical business unit applications. The CSDS support responsibilities and response metrics are based on the individual business units.

IT Operations Center (ITOC) can be considered **Level 2** support organization for all incidents from monitored system events or end-user reported incidents transferred from the IT Service Desk, that impact multiple users. The ITOC supports all Business Units. The ITOC is positioned to be the single point of contact and coordination for all infrastructure and application-based incidents or system events. The ITOC support responsibilities and response metrics are included in the “Operations Services-Standard” service, within the IT Service Table for VPs, Cloud & Infrastructure.

For incidents experienced by a single end user, Client Services may need to transfer the ticket to a **Level 3** support organization. For system incidents, the ITOC may need to transfer the ticket to a **Level 3** support organization. Level 3 support organizations include Application Support teams and Technical Engineering teams. The support responsibilities and levels of support may vary, based on the operations support model of the application.

Escalation of operational issues follows a standard process via the

- IT Service Desk
- IT Operations Center
- Director, IT Service Operations and Network Management
- Business Relationship Manager
- Chief Information Officer

Escalation of performance issues related to an IT Service is via the IT Director responsible for that service.

Technology Refresh & Capital Investments/Depreciation

The ongoing refresh and upgrade of technology is based on ownership of the IT Asset, and how it is reflected on either BSC books or the Client Company books. There are generally two approaches that are leveraged for technology assets:

BSC IT

1. For information technology that is and will most likely always be shared or changed/leveraged across Client Companies, BSC will own the technology asset.
 - a. BSC is responsible for the funding of the original investment, as capital funding, probably via a project, and must plan for and budget capital investment for future refresh and upgrades to maintain the health of the IT Asset.
 - b. The IT asset investment is on BSC's books as an IT Asset.
 - c. BSC will record depreciation and track this depreciation at the IT Asset Class level, such that it can be appropriately recovered from the Client Companies that leverage the shared environment, based on the Depreciation IT Services. These IT services are by asset class and billed out by rate x quantity of the appropriate shared asset counts.
 - d. This is applicable to hardware infrastructure, shared PCs within BSC, as well as enterprise/infrastructure software packages, and generally includes, but is not limited to,
 - i. Shared data network (networking equipment supporting more than one business unit's network traffic)
 - ii. Data Center technologies for all virtual environments housed in corporate data centers
 - iii. Servers/Storage for applications and IT services (Note: in situations where physical servers are dedicated to and maintained by a Client Company, these may be owned by the Client Company)
 - e. During annual LRP process, Client Companies and BSC will collaborate to adequately forecast demand for technology assets.
2. For information technology that is wholly dedicated or uniquely designed to support a single Client Company, the Client Company will own the technology asset.
 - a. The Client Company is responsible for the funding of the original investment, as capital funding, probably via a project, and must plan for and budget capital investment for future refresh and upgrades to maintain health of the IT Asset.
 - b. For Client Company owned assets, the Client Company is expected to adhere to recommended refresh guidelines (governed by Cloud & Infrastructure) to prevent interfering with the reliability of the overall enterprise infrastructure.
 - c. The IT asset investment is on the Client Company books as an IT Asset.
 - d. The Client Company will hold the depreciation and must budget accordingly.
 - e. In the event an Op Co does not comply with a recommended refresh schedule, support will be on a best effort basis. IT will not be accountable for performance metrics related to service support.
 - f. This is applicable to hardware infrastructure, PCs, as well as software packages, and generally includes, but is not limited to,
 - i. Personal Computers
 - ii. Dedicated servers/storage for an Opco's use

- iii. Dedicated network equipment for specific Client Company Real-Time/SCADA systems
 - iv. Dedicated network equipment for specific Client Company locations
 - v. Application software specific to a business unit
3. Enterprise IT application software assets will be allocated and recorded on an OpCo's books at the time of purchase/ development; using an appropriate, approved cost-causative allocation method as set forth in Exelon's General Services Agreement. Generally, BSC will purchase assets on behalf of the OpCo's, with the amount recorded at the OpCo level representing a beneficial ownership right in or right-to-use the IT asset.

Enterprise Demand Manager (EDM)

The standard model for requesting IT application changes is via the Enterprise Demand Manager (EDM). The level of service for requested changes to an IT service is based on the metric, *Work Requests Delivered On-Time*. *Work Requests Delivered On-Time* is defined as the delivery of a work request (EDM) to the user acceptance test (UAT) environment by the commitment date. The standard method for tracking an application (or IT service) work request is via Enterprise Demand Manager (EDM). For those Application/Service delivery teams not using the EDM process, IT will measure the level of service using data provided by the team. For those teams using PPM/EDM, the commitment date is negotiated between the Requesting Demand Manager, the Application/Service Delivery Manager, and the Service Provider based on criticality and prioritization. Expected performance is that 90% of work requests are delivered on time.

Successful user acceptance testing (UAT) is defined as the delivery of a work request that passes UAT testing (i.e. accepted by the Client UAT tester) in a certain number of cycles based on complexity. The intention of this measure is twofold; to measure the quality of code provided by the IT Service Owner, and measure the ability of the IT Service Owner to minimize the number of cycles that users are required to go through until a successful test is achieved.

The following conditions must be met for a UAT cycle to be considered successful:

- UAT Tester confirms that the change meets the documented requirements
- No code change required by the IT Service Owner's development staff within one cycle
- No additional work required by System Administrators or Database Administrators within one cycle
- No additional application configuration work required by personnel within one cycle

Work requests are tracked in Exelon's PPM tool as Enterprise Demand Manager [EDM's]. The date that code is delivered into the appropriate UAT environment is tracked in the EDM, as is the subsequent pass/fail (acceptance or rejection) of the UAT. A successful UAT will be identified by a lack of failure in the workflow of the UAT. To accurately measure and enforce the intent of the measure, IT assumes that UAT will immediately fail the UAT if any further code, database or application configuration work is required before one a work item begins UAT.

IT Service Details

IT Application Portfolio Management database is the system of record for all applications and their support levels. Always refer to APM for the most recent listing and categorization. For specific information related to "High" Business Value applications, refer to the Business Unit-specific Service Level Agreements. NOTE: For Medium and Low Business Value applications, refer to your Business Unit's application list from the APM tool to confirm Support Service Level and DR rating.

Legal Services

Legal Services Introduction

BSC Legal Services will provide a full range of legal services, including representation, advice, counseling, training and other support, to meet the legal needs of our Affiliates and their Subsidiaries.

BSC Legal services will provide governance, management and support services for Exelon Corporation and its Subsidiaries, including services for the Exelon Board of Directors and the Subsidiaries' boards of directors, as required, legal counseling for securities matters and corporate finance, manage the Ethics and Compliance Program, including the Audit Committee's process for receiving and investigating concerns about potential violations of the Code of Business Conduct, manage the shareholder service function, coordinate the development of corporate policies and the Management Model, and coordinate records management, subsidiary management and the FERC Interlock processes.

Legal Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
914	EBSC Legal – Legal Operations and Administration	Legal Operations and Administration provides practical, proactive and creative solutions to the current and future legal needs of Exelon and is responsible for the business functions of Exelon Legal which includes financial management, client billing, business planning and analysis, human resources, systems management and general administration.	EVP/SVP & General Counsel
915	EBSC Legal – Corporate & Commercial	Corporate & Commercial provides support for, commercial contract negotiations (including purchases of materials and services, consulting services, confidentiality agreements, and licenses); intellectual property matters; antitrust, strategic transactions (including mergers, acquisitions, divestitures, and joint ventures); limited tax advisory services; securities and financing matters (including issuance of debt and equity securities, negotiation of credit agreements, financial reporting, and issues relating to disclosures of business and financial information); credit and collection matters and bankruptcy; real estate matters (including utility easements, right-of-way vegetation maintenance, recovery of utility relocation costs, purchases and sales, local planning and zoning board approvals, landlord-tenant disputes and condemnation proceedings); subsidiary management and other corporate legal matters.	

Service ID	Service Name	Service Description	Service Owner
916	EBSC Legal – Environmental Health & Safety	Environmental, Health & Safety supports compliance with federal, state and local environmental, health & safety laws and requirements (including enforcement actions, permitting and licensing); environmental, health & safety audits, site remediation, hazardous substance and waste management; environmental aspects of transactions and due diligence; environmental cost recovery litigation; OSHA reporting and record keeping and defense of enforcement actions, and support for strategic initiatives related to environmental and energy policies.	
917	EBSC Legal – Labor & Employment Group	Labor & Employment Group advises and represents the companies in all labor and employment related matters (including collective bargaining, grievance and arbitration processing, equal employment, affirmative action, covenants not to compete, defamation, immigration, severance, subpoenas, Unfair Labor Practices, whistleblower claims, wrongful discharge claims); and develops, supports and implements policies and training initiatives to ensure compliance with labor and employment laws.	
918	EBSC Legal – Compensation and Benefits	Compensation and Benefits, a subgroup of Labor & Employment, provides support for all employee benefit and compensation matters including ERISA, employment contracts, workers compensation plans, retirement, health care and welfare plans, executive compensation, severance benefits, and related litigation.	
919	EBSC Legal – Litigation	Litigation provides support for litigation and dispute resolution of all types of matters (including breach of contract, commercial disputes, personal injury and property damage, building code violations, class actions, decontamination and decommissioning, insurance coverage disputes, mechanics liens, shareholder derivative, OSHA, tax, tariffs, subpoenas and liability avoidance) in all forums, including state and federal courts, both at the trial and appellate levels, municipal courts, administrative agencies, and in arbitrations and mediations.	
920	EBSC Legal – Exelon Generation Wholesale & Retail	Wholesale & Retail provides support across all matters impacting the wholesale and retail commercial business lines, including negotiation and management of transactional documentation, issues relating to entry into new markets and new product lines, litigation support, and mergers and acquisition support.	
921	EBSC Legal – Regulatory	Regulatory consists of two distinct subgroups. One is responsible for federal and state, regulatory and compliance matters affecting the Exelon competitive businesses. The scope of the representation includes power and gas, wholesale and retail. The group represents the competitive businesses in state and federal regulatory proceedings and in related appellate proceedings, on matters including approvals for mergers and acquisitions, market design, cost recovery, infrastructure development, renewable energy policies, procurement processes, restructuring initiatives, capacity market rules, gas pipeline and storage rates, competitive retail access rules, and	

Service ID	Service Name	Service Description	Service Owner
		<p>other regulatory matters affecting the competitive businesses' ability to transact in the market or the value proposition for such activity. The group also represents the company before federal agencies on issues related to derivatives and financial reform. In addition, the group is responsible for the retail and wholesale compliance programs for the competitive businesses, which includes the development of policies and procedures for prevention, detection, and correction of compliance issues.</p> <p>The other subgroup provides services to support Exelon Utilities on federal regulatory matters related to transmission regulation and policy, including representation of the Exelon Utilities before the Federal Energy Regulatory Commission and related appellate proceedings, providing advice and support on legal and policy matters related to the Exelon Utilities' membership and participation in regional transmission organizations, and other legal support for compliance, contractual, strategic initiatives and rate recovery matters related to transmission for the Exelon Utilities.</p>	
923	EBSC Legal – Exelon Generation Legal Group	Exelon Generation Legal Group provides support for matters across all areas related to or impacting generation issues, including commercial contracts, representation before the Nuclear Regulatory Commission ("NRC"), FERC and NRC compliance issues, plant licensing and re-licensing, employment, environmental compliance, and property tax.	
651	EBSC Legal – Legal Governance	Legal Governance ensures that the business strategies, policies, procedures and programs of Exelon and its subsidiaries are developed and applied in full recognition of legal implications and risk and are legally sound; ensures that the legal affairs of the companies are attended to effectively, efficiently, and on a timely basis; oversees the Legal practice groups/areas, and oversees and provides legal services support for corporate governance matters.	
789	Legal As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	
692	BSC Corp Secretary As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is "trued up" each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	
904		Costs associated with establishing combined operations as a result of a merger.	

Service ID	Service Name	Service Description	Service Owner
	BSC Costs to Achieve		EVP/SVP & General Counsel
648	Corporate Secretary	<ul style="list-style-type: none"> Plans and prepares for all aspects of the Company's board and board committee meetings as requested Makes arrangements for all directors' travel, lodging and other services necessary for their service to the Company as requested Administers the compensation programs and related deferral programs for directors Provides legal counsel on financing activities and compliance with federal securities laws and stock exchange listing standards Manages the daily administration of all of Exelon's equity compensation plans Administers Exelon's Securities Trading Procedure (Stock Trading Clearance) Maintains official corporate records of the Board of Directors and shareholders Manages the Company's Shareholder Services function, including the transfer agent contract 	SVP, Deputy Gen. Counsel

In addition, certain Legal services may be purchased from third-party sources on behalf of the Client Company or provided directly to (embedded in) the Client Company.

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
914	EBSC Legal – Legal Operations and Administration	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated - Modified Massachusetts Formula
915	EBSC Legal – Corporate & Commercial	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated - Modified Massachusetts Formula
916	EBSC Legal – Environmental Health & Safety	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials

BSC Legal Services

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
			Allocated - 529210	Allocated - Modified Massachusetts Formula
917	EBSC Legal – Labor & Employment Group	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated - Modified Massachusetts Formula
918	EBSC Legal – Compensation and Benefits	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated - Modified Massachusetts Formula
919	EBSC Legal – Litigation	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated - Modified Massachusetts Formula
920	EBSC Legal – Exelon Generation Wholesale & Retail	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated - Modified Massachusetts Formula
921	EBSC Legal – Exelon Regulatory	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated - Modified Massachusetts Formula
923	EBSC Legal – Exelon Generation Legal Group	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated – Cost Causative Method
651	EBSC Legal – Legal Governance	923 – Outside Service Employed	Direct – 529200	Direct - Time and Materials
			Allocated - 529210	Allocated - Modified Massachusetts Formula
789	Legal As Requested	923 – Outside Service Employed	Direct - 529200	Time and Materials
			Allocated - 529210	Modified Massachusetts Formula
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529210	Modified Massachusetts Formula

BSC Legal Services

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
648	Corporate Secretary	923 – Outside Service Employed	Direct - 529200	Time and Materials
			Allocated - 529210	Modified Massachusetts Formula
692	BSC Corp Secretary As Requested	923 – Outside Service Employed	Allocated - 529210	Cost Causative Method

Responsibilities

Task / Responsibility	BSC Practice Area	Client Company
Notify Legal of new matter or request for service		X
Advise client of potential legal issues that come to the attention of the Legal Area	X	
Advise Legal Area of business objectives		X
Provide Legal with requested and necessary information on a timely basis		X
Have run appropriate conflicts check for matters requiring outside counsel	X	
Open new matter in legal matter management system	X	
Assign appropriate legal resources to matter, and record internal Legal time spent on each Client Company	X	
Provide monthly billing summary and other requested reporting for each matter	X	
Authorize settlement or other disposition of legal matter	X	X
Create case budgets for major lawsuits, transactions and other matters as requested by client	X	

BSC Legal Services

Task / Responsibility	BSC Practice Area	Client Company
Develop and Distribute Billing Guidelines for outside counsel	X	
Develop Model Retention Agreement for outside counsel	X	
Obtain Retention Agreement for new matters assigned to outside counsel	X	
Manage the relationship with outside counsel	X	
Recommend reserve amounts as needed	X	
Budget for and fund recommended reserve amount		x

Performance Measurement

Legal Services Performance Metrics Table

Reference the Legal Services Business Plan for performance metrics.

Real Estate

Real Estate Introduction

The BSC Real Estate (RE&F) practice area provides overall strategy development and implementation for Exelon's non-utility property holdings and utility property holdings (with the exception of substations, property tax management, land rights/railroad access management, third party attachments, etc.) with regards to portfolio & real estate planning, lease management, occupancy & project management, land management, and property management (for PHI and ComEd) for the facilities that support the Company's non-utility and utility operations.

Real Estate Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
600	Real Estate Services & Asset Management Strategy	<ul style="list-style-type: none"> Real Estate Portfolio & Asset Management Strategy <ul style="list-style-type: none"> Develop and execute real estate and portfolio strategies Manage and/or deliver transactions associated with the Company's facilities and related land and infrastructure properties Lease and Records Administration <ul style="list-style-type: none"> Manage the company's property and lease records for Exelon's non-utility and several utility facilities, land and infrastructure property holdings Administer lease payments, billing and receivables for all non-utility and several utility facilities leases, land-related obligations, easements, and infrastructure agreements for which the Company is landlord, licensee, or tenant Land Management <ul style="list-style-type: none"> Manage land real estate-related processes for the company's non-utility land obligations and holdings, and utility land requirements up to the Substation. Maintain landowner, municipal and key stakeholder relations in support of land management activities. 	VP, Real Estate & Facilities
954	Facilities Management	<ul style="list-style-type: none"> Deliver on-site property management services for the non-utility office and disaster recovery locations, including occupancy, move, project, and facilities management for these locations, and utility locations, where applicable. Deliver on-site property management services for PHI and ComEd facilities (corporate buildings and service centers). 	VP, Real Estate & Facilities
605	Mail Reception Services	Provide mail delivery and reception services for BHQ, KS ⁽¹⁾ and Chase facilities.	VP, Real Estate & Facilities

Service ID	Service Name	Service Description	Service Owner
606	Project Design & Construction	<ul style="list-style-type: none"> Manage Real Estate & Facilities related projects throughout the project life-cycle (initiation, pre-construction, execution & control, and close-out). Real Estate and Facilities supports all projects across Exelon up to the Substation and protected areas at Generation locations. Workplace Strategy & Occupancy Planning <ul style="list-style-type: none"> Manage all move request and Workplace Strategy across Exelon properties to create an employee experience and improved utilization of space Develop Workplace Strategy to create consistent employee experience across Exelon properties, where appropriate <p>Handle all move requests across Exelon in collaboration with project management and in alignment with the Workplace Strategy</p>	VP, Real Estate & Facilities
235	Real Estate As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors.	VP, Real Estate & Facilities
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	VP, Real Estate & Facilities
833	BSC Revenue Adjustment	The difference between actual costs and revenues from billings to the Client Companies is trued-up each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	VP, Real Estate & Facilities

- (1) Note that KS mail delivery and reception services are also managed by BSC Real Estate, however the budgeted spend is not included within BSC's LRP. These reside at the OpCos.

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
600	Real Estate Services & Asset Management Strategy	923 – Outside Service Employed	Direct 529320	Time and Materials
			Allocated - 529330	Managed Square Footage
954	Facilities Management	923 – Outside Service Employed	Direct 529320	Time and Materials
			Allocated - 529330	Managed Square Footage
605	Mail Reception Services	923 – Outside Service Employed	Allocated - 529330	Headcount
606	Project Design & Construction	923 – Outside Service Employed	Direct - 529320	Time and Materials
235	Real Estate As Requested	923 – Outside Service Employed	Direct - 529320	Time and Materials

BSC Real Estate

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529710	Modified Massachusetts Formula

Responsibilities

EBSC RE&F will perform the services and functions described below, working closely with our clients to assure that goals and objectives are aligned, and that our clients are engaged at the appropriate levels of their organization.

Task / Responsibility	BSC Practice Area	Client Company
Real Estate Portfolio & Asset Management & Strategy		
Develop asset plans for facilities, incorporating business requirements, real estate considerations, market dynamics and values, and internal economic considerations	X	
Develop portfolio strategy for Exelon facilities and approved business cases which may include buy, hold, sell, or lease options. Develop and execute implementation plans in support of the strategies.	X	
Manage facilities related transactions (sale, purchase, lease, sublease, etc.) and the service providers associated with executing portfolio and asset strategies	X	
Define lease audit strategy and manage lease audit performance to recover costs from landlords	X	
Work with landlords to address or resolve lease and tenant related concerns and issues	X	
Lease Administration		
Perform lease/property administration, payment, or billing services for all facilities for which the Company is landlord or tenant.	X	
Perform lease/property administration, payment, or billing services for easement, infrastructure, agreements for which the Company is landlord or tenant, in compliance with Sarbanes-Oxley and FASB	X	
Maintain property and lease information and files for owned, leased, and external tenant leases and properties. Develop and report on property and lease data, as required	X	
Perform and participate in monthly, quarterly, and year-end financial close processes in support of lease administration services	X	
Project Management		
Develop and manage capital improvement projects for all locations managed by BSC RE&F	X	
Land Management		

Task / Responsibility	BSC Practice Area	Client Company
Manage landowner obligations and contractual compliance, including variable revenue-based calculations, and payment processing for wind and solar obligations.	X	
Perform site due diligence and landowner/document curative work for existing and acquisition projects, development projects and financing projects.	X	
Workplace Strategy & Occupancy Planning		
Develop occupancy plans and activities for facilities, including development of workplace standards, policies and strategies, space programs and space planning	X	
Develop and manage occupancy planning projects for locations managed by BSC RE&F	X	
Facilities Management		
Provide on-site management of office or headquarters sites, including management of service providers, work orders and service requests, and landlord related billing or operational activities, where applicable	X	
Manage BCP alternate location assignment, as required by department plans	X	
Manage landlord relations, vendors and contracted services in support of locations without an on-site Exelon property manager	X	
For Chicago and Baltimore HQ, provide receptionist services	X	
Budgeting and Billing		
Define and track the allocation of lease/owned and facilities costs by OpCo	X	
Develop OpCo RE&F budgets (held by OpCo) associated with lease/owned and facility services	X	

Performance Measurement

Real Estate Performance Metrics Table

Reference the Real Estate Business Plan for performance metrics.

Risk

Risk Introduction

BSC Risk Management has responsibility for Enterprise Risk Management and Credit Risk Management governance and oversight.

Risk Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
638	BSC Risk Management Services	<ul style="list-style-type: none"> Risk management, governance and oversight. Responsible for the development of a comprehensive enterprise risk framework with policies/processes and implementation of enterprise reporting of risk metrics and limits. Understand and assist in mitigating all potential enterprise wide risks. 	Chief Enterprise Risk and Credit Officer
950	BSC Enterprise Credit & Risk Management Operations Services	<ul style="list-style-type: none"> Enterprise credit & operational risk management, governance and oversight Responsible for the development of a comprehensive credit & operational risk framework with policies/processes and implementation of enterprise reporting of credit exposures, metrics and limits Provide credit services to all Exelon OpCos Understand and assist in mitigating all potential enterprise wide credit & operational risks. Responsible for the development and implementation of enterprise wide bankruptcy and litigation risk policies and procedures Consolidate bad debt reporting across all Exelon OpCos that includes variance analysis and key drivers reporting Administration & governance of OpCo level Risk Management Committee (RMC) meetings & content 	VP, Enterprise Credit Risk
233	Risk As Requested	<ul style="list-style-type: none"> As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors 	Chief Enterprise Risk and Credit Officer
904	BSC Costs to Achieve	<ul style="list-style-type: none"> Costs associated with establishing combined operations as a result of a merger. 	Chief Enterprise Risk and Credit Officer

Service ID	Service Name	Service Description	Service Owner
833	BSC Revenue Adjustment	The difference between actual costs and revenues from billings to the Client Companies is trued-up each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	Chief Enterprise Risk and Credit Officer

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
638	BSC Risk Management Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
950	BSC Enterprise Credit & Risk Management Operations Services	923 – Outside Service Employed	Direct - 529050	Time and Materials
			Allocated - 529060	Modified Massachusetts Formula
233	Risk As Requested	923 – Outside Service Employed	Direct - 529050	Time and Materials
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529060	Modified Massachusetts Formula

Performance Measurement

Risk Performance Metrics Table

Reference the Risk Business Plan for performance metrics.

BSC Risk

Supply

Supply Introduction

BSC Supply / Accounts Payable will provide Strategic Sourcing, Supply Operational Support, Accounts Payable invoice processing, the Credit Card Program / Expense Reimbursement, and Supply Business Operations and Technical Services from BSC Supply to the OpCos and Subsidiaries. This does not apply to embedded Supply Services.

Supply Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
628	Strategic Sourcing for Materials	Supply negotiates strategic contracts for materials used within specific business unit and enterprise-wide, acting as an authorized agent. Strategic contracts are designed to provide materials that meet business unit specifications and requirements, to take advantage of Exelon's marketplace leverage, and to optimize processes for fulfilling orders and delivering materials to users. Supply supports the business units in managing supplier performance and creates and manages supplier performance against various metrics including expenditures, savings, quality, supplier performance, process improvements, payment channels and business placed with diverse suppliers. Strategic Supply seeks to create value for its business units by minimizing the total cost of ownership of the material's complete lifecycle (from procurement through disposal). In addition, Strategic Supply partners with the business units in forecasting and managing demand, developing spend projections/budgets, and alignment of supplier's contractual requirements to business unit needs and goals. Excludes sourcing of nuclear fuel throughout the life cycle of the material.	Director, Utility Strategic Sourcing Materials; Director, Genco Strategic Sourcing Materials

Service ID	Service Name	Service Description	Service Owner
671	Strategic Sourcing for Services	Supply negotiates strategic contracts for services used within specific business units and enterprise-wide, acting as an authorized agent. Strategic contracts are designed to provide services that meet business unit specifications and requirements, to take advantage of Exelon's marketplace leverage, and to optimize processes for fulfilling orders and delivering services to users. Supply supports the business units in managing supplier performance and reports metrics on such parameters as expenditures, savings, supplier performance, process improvements, payment channels and business placed with diverse suppliers. In addition, Strategic Supply partners with its clients in forecasting and managing demand, developing spend projections/budgets, and alignment of supplier's contractual requirements to business unit needs and goals.	Director, Utility Strategic Sourcing Services; Director Genco Strategic Sourcing Services; VP Supply Corporate Sourcing Services
676	Supply Operations Management	Centralized support of the day-to-day field operations, enabling implementation of and compliance to standardized processes and procedures based on best practices, as well as continuous improvement. Handles emergent issues of complexity requiring off-location assistance, including support in resolving complex materials and services issues. Coordinates common projects affecting multiple locations and provides oversight and recommendations for routine program assessments, outage readiness, and outside organizational assessments including central purchasing and central procurement engineering.	VP, Supply Operations & Sourcing – Genco; VP, Supply Operations & Sourcing Exelon Utilities
678	Supply Systems, eBusiness, & Support	Provide leadership to identify technological options to improve business processes; manage the performance and effectiveness of Supply systems; implement technology infrastructure; provide data for decision-making; standardize/automate collection and reporting of data; establish and lead cross-functional business/technology teams; ensure Exelon procure-to-pay systems are Sarbanes-Oxley compliant and aligned with compliance and policy requirements; provide governance, oversight, and lead cross functional project teams in the development and implementation of high impact/high risk process improvements and strategic projects; manage multiple projects that are complex, high risk and have high organizational impact; and administer and strengthen the reliability of the annual IRS filing process, for Exelon domestic and majority of foreign transactions	VP, Business Operations and Technical Support

Service ID	Service Name	Service Description	Service Owner
687	Supply Site Operations	Support of the day-to-day field operations, enabling implementation of and compliance to standardized processes and procedures based on best practices, as well as continuous improvement. Handles emergent issues, including support in resolving complex materials and services issues. Coordinates with the business on common projects, including support of operations and maintenance, at the site. Centralized support of day to day procurement, procurement engineering and reverse engineering activities to enable application of synergies, implementation of a standardized supply chain model, adaptation of best practices and continuous improvement.	VP, Supply Operations & Sourcing – Genco; VP, Supply Operations & Sourcing Exelon Utilities
631	Supply Operations Support	Provides governance and oversight for the Sourcing and Operations groups supporting each business unit which also includes business planning, management review meetings, client meetings, and project management activities.	VP, Supply Operations & Sourcing – Genco; VP, Supply Operation & Sourcing - Exelon Utilities; VP Supply Integration
632	Investment Recovery	Management of the risk associated with the disposition of surplus and obsolete assets. Ensures that materials and equipment are disposed of in compliance with all applicable federal, state, and local regulations and in a manner that is most appropriate and returns the best possible value, using a consistent pricing strategy for the disposition of inventory and non-inventory assets.	VP, Business Operations and Technical Support
633	Inventory Management	Support Supply operations in the management of site and enterprise-wide inventory in a consistent manner that fully complies with all applicable regulatory requirements and aligns with Business Unit needs. Develop and recommend strategies for inventory, surplus inventory, and optimum stocking levels. In partnership with Supply Operations, goals will be established and measured to monitor progress and maintain alignment with business and financial needs.	VP, Business Operations and Technical Support

Service ID	Service Name	Service Description	Service Owner
670	Strategic Sourcing for Shared Materials and Services	Supply negotiates and executes strategic contracts for materials and services needed for technology-related services and materials within and across multiple business units, acting as an authorized agent. Strategic contracts are designed to provide materials and services that meet business specifications and requirements, take advantage of Exelon's marketplace leverage, optimize processes and maximize value in delivering materials and services to users. Supply supports the business units using such materials and services in providing category management, managing supplier performance and reports metrics to the governing business units on such parameters as expenditures, savings, supplier performance, process improvements, payment channels and business placed with diverse suppliers. In addition, Strategic Supply partners with its clients in forecasting and managing demand, developing spend projections/budgets, and alignment of supplier's contractual requirements to business unit needs and goals.	VP, Supply Corporate Sourcing
630	CSO/Supply Governance	Provide improved performance, accountability and consistency across Supply to ensure we provide a high level of support to our business partners through the development and management of Supply policy (management model), performance accountability (i.e. management review meetings), training strategy and support, business planning and performance indicators, communication, records management, , contract billing and compliance audits, and benchmarking. Also provides financial and analytical expertise, data visualization, supplier diversity reporting and actionable insights to drive sustainable results and savings – includes sourcing initiative support, market intelligence, risk assessment and other financial analyses.	VP, Business Operations and Technical Support

788	Supply As Requested	<p>As requested, services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors</p> <p>BSC will budget overtime for planned outages and emergency response activities (i.e. unplanned maintenance outages). BSC will also budget for non-labor operations support where the Client does not budget such as certain Fleet equipment (trailers) or other systems and tools to maintain operations such as oil processing equipment, cranes, warehouse docks</p> <p>Client will be responsible for the following financial transactions:</p> <ul style="list-style-type: none"> • Budget overtime dollars for business unit directed overtime, • Labor costs for non-supply functions performed by supply (e.g. storm duty), • Cost of expediting materials, cost of disposition of shelf life expired items and obsolescence, • Client Requested Vendor Audits, including NUPIC, • Associated adjustments due to inventory cycle count discrepancies, • Power Lab Charges, • Rentals of supplementary handling equipment, • Client Requested Vendor Audits (non-labor costs), • Maintenance for non-Supply Inhabited Facilities, • Third party freight, shipping, and • Expedited manufacture. <p>As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon's CEO or Board of Directors for Accounts Payable for the given Service Period.</p> <p>As requested services include:</p> <ul style="list-style-type: none"> • Project - A unique activity, or set of activities, that accomplishes a measurable objective, and has specific beginning and end dates, and an identified funding source. • Enhancement - Development, testing, and implementation activities which are smaller than the minimum size of a project. Small enhancements include only changes to an existing application and cannot introduce a new application into the environment. • Consulting - Providing specialist advice and expertise independent of an identified project or enhancement • Staffing – staffing shifts not normally staffed for readiness and planning purposes such as generator standby, critical venue support and storm potential <p>AND one or more of the following exists:</p>	<p>VP, Genco Supply Operations & Sourcing; VP, Utilities Supply Operations & Sourcing;</p> <p>Directors of Genco Supply Operations; Directors/Manager of Utilities Supply Operations</p> <p>VP, Business Operations & Technical Support;</p> <p>VP, Supply Corporate Sourcing</p>
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Service ID	Service Name	Service Description	Service Owner
		<ul style="list-style-type: none"> Discretionary and applies to a single/small number (2-3) OpCos Regulatory and only applies to one OpCo without the potential to apply to others Is outside the standard platform Requires outside services to complete 	
342	BSC Accounts Payable Transactions	<p><u>Transaction Processing</u></p> <ul style="list-style-type: none"> Support of Accounts Payable transactions requiring EBSC AP resources for entry processing (i.e. Invoices received via US Mail and email) Support of Non-Accounts Payable processed transactions not requiring EBSC AP resources for entry processing (i.e. Invoices received via Electronic Data Interchange (EDI), Contract Invoice Automation (CIA)) Associated AP & non-AP Support Services <ul style="list-style-type: none"> Timely processing of supplier invoices Storage of invoices to enable short-term availability and long-term archival storage Facilitate resolution of invoice discrepancies Perform tax reporting as required by law (1099's/1042's) Disburse same day check requests internally and externally as requested Process cancelled checks and stop payments Provide support to internal and external audits Duplicate Payment identification and recovery Process add/change/remove Vendor Maintenance requests Manage/Govern Voucher Process End user process support 	VP, Business Operations & Technical Support
324	BSC Accounts Payable Credit Card Transactions	<ul style="list-style-type: none"> Corporate Credit Card Transactions <ul style="list-style-type: none"> Process new/add/change requests User system and process support Administration of Corporate Credit Card Program Administration of Out of Pocket Reimbursement Program Issue Management Reports documenting card usage and compliance Administration of file transfers, including management of accounting anomalies Provide monthly reporting in support of reconciliation of credit card clearing accounts Provide support to internal and external audits Quarterly Credit Card rebate received directly from credit card provider Make payments to Bank Card provider under Exelon Corporate Credit Card Program 	VP, Business Operations & Technical Support

BSC Supply

Service ID	Service Name	Service Description	Service Owner
347	Diverse Business Empowerment	EDBE leads supplier diversity activities on behalf of Supply within Exelon Utilities. EDBE partners with Utility Sourcing to ensure inclusion of diverse-certified vendors in the sourcing process. EDBE also partners with business partners at each Utility to establish annual diverse spend goals, as well as interface with various key external stakeholders—regional and national-- on matters related to engaging diverse businesses. In addition, EDBE partners with Supply BOTS to produce regular data reports that track actual and projected diverse spend performance. EDBE also develops the overall strategy at each Utility for managing local and diverse business engagement. EDBE supports the Utilities in managing supplier diversity performance and reports metrics at Regulatory forums in various jurisdictions across the EU footprint.	Director of Exelon Diverse Business Empowerment
346	BSC AP Services Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is “trued up” each year by allocating it pro rata to the Client Companies based on their share of Total AP Service Billings.	Chief Supply Officer
833	BSC Revenue Adjustment	The difference between actual cost and revenues from billings to the Client Companies is “trued up” each year by allocating it pro rata to the Client Companies based on their share of Total Service Billings.	Chief Supply Officer
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	Chief Supply Officer

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
628	Strategic Sourcing for Materials	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Materials
671	Strategic Sourcing for Services	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Services
676	Supply Operations Management	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Materials and Services

BSC Supply

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
678	Supply Systems, eBusiness, & Support	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Billed and Embedded Costs
687	Supply Site Operations	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Materials and Services
631	Supply Operations Support	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Materials and Services
632	Investment Recovery	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Materials
633	Inventory Management	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Materials
670	Strategic Sourcing for IT Materials and Services	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Materials and Services
630	CSO/Supply Governance	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Billed and Embedded Costs
788	Supply As Requested	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Billed and Embedded Costs
342	BSC Accounts Payable Transactions	923 – Outside Service Employed	Direct – 529450	Unit Price – Per # of AP transactions processed

BSC Supply

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
324	BSC Accounts Payable Credit Card Transactions	923 – Outside Service Employed	Direct – 529450	Rebate and/or Costs based on ratio of Credit Card spend
347	Diverse Business Empowerment	923 – Outside Service Employed	Direct - 529450	Time and Materials
			Allocated - 529460	Total Supply Sourced Materials and Services
346	BSC AP Services Revenue Adjustment	923 – Outside Service Employed	Allocated – 529460	Total AP Service Billings
833	BSC Revenue Adjustment	923 – Outside Service Employed	Allocated - 529460	Total Service Billings
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Fully Distributed Costs
			Allocated - 529710	Cost Causative Method

Responsibilities

BSC Supply and Client Responsibilities are delineated in Supply Procedures located on the BSC Management Model Website and in the Exelon Nuclear Electronic Document Management System (EDMS). Applicable Procedures are:

- ❑ “SM-AC-XX” for All Supply
- ❑ “SM-EP-XX” for Exelon Power
- ❑ “SM-AA-XX” for Exelon Nuclear only
- ❑ “SM-CE-XX” for ComEd only
- ❑ “SM-PE-XX” for PECO only
- ❑ CNG-SC-1.01-1001, Processing New Item Requests, Requisitions, Request for Quotations, Issuing Purchase Orders and Revisions

Additional Exelon Management Model documents that may be applicable to BSC Supply employees, including embedded personnel, are contained in the Utilities (ED or EU) branch of the Exelon Management Model (XX-ED-## or XX-EU-##) or the Nuclear (AA) branch of the Exelon Management Model (XX-AA-##); housed in Electronic Data Management System tool (EDMS).

BSC Management Model Website is accessible via the Exelon Home Page in the Quick Links table.

Accounts Payable / Credit Card Services Task / Responsibility	EBSC	Client Company
Accounts Payable – Invoice Processing Services		
Provide accurate information for Invoice Entry (i.e. PO/Contract #, Rel, Code Block)		X
Receive and prepare manual invoices for entry	X	
Timely approval of invoices		X
Archive invoices	X	
Enter manual Invoices	X	
Process invoices for payment as defined in documented processes	X	
Respond to vendor and internal inquiries	Primary	Support
Administer processing of discrepant invoices as defined in documented processes	Primary	Support
Disburse emergency check requests internally and externally as requested	X	
Establish and maintain procedures for A/P process	X	
Issue 1099's as required by law	X	
Identify and recover potential duplicate payments and unrecovered credits	Primary	Support
Process cancelled checks and stop payments	X	
Provide accurate information for Vendor Maintenance (i.e. TIN, W-9, Remit, Address)		X
Process vendor add/change requests and respond to routine user questions	X	
Enter/Create voucher(s)		X
Respond to routine Voucher user questions & requests	X	

BSC Supply

Accounts Payable / Credit Card Services Task / Responsibility	EBSC	Client Company
Provide support to internal and external audits	Primary	Support
Expense Reimbursement Services		
Use Corporate Credit Card in accordance with policy	X	X
Process card add/change requests and respond to routine user questions & requests	X	
Update system with card add/change requests received from client	X	
Process Corporate Credit Card payment requests	X	
Retention of records	X	
Management of monthly file posting to General Ledger	X	
Resolution of code block anomalies		X
Reconcile clearing accounts related to monthly payment to Credit Card provider	X	X
Inadvertent process administration and reconciliation	X	
Respond to routine Out of Pocket reimbursement user questions & requests	X	

Performance Measurement

Supply Performance Metrics Table

Reference the Supply Business Plan for performance metrics.

Transportation

Transportation Introduction

Transportation area provides flight transportation to authorized executives.

Transportation Services Table

Service Table

Service ID	Service Name	Service Description	Service Owner
783	BSC Use of Corporate Jet	Provide and coordinate private flight transportation to authorized executives, services include Executive Aviation Accounting Services which includes the payment of monthly maintenance and flight charge invoices, billing passengers for flight hours, maintaining passenger documentation and records, preparing executive reports, and support of internal and external audits.	Transportation Director
667	BSC Corp Jet Adjustment	The difference between actual costs and revenues from billings to the Client Companies is “trued up” each year by allocating it pro rata to the Client Companies based on their share of Total Transportation Service Billings.	Transportation Director
904	BSC Costs to Achieve	Costs associated with establishing combined operations as a result of a merger.	Transportation Director
794	Transportation As Requested	As requested services represent emergent work requiring additional resources relative to the plan and are services specifically requested by a Client Company, Exelon’s CEO or Board of Directors.	Transportation Director
934	BSC Use of Corporate Helicopter	Provide and coordinate private flight transportation to authorized executives, services include Executive Aviation Accounting Services which includes the payment of monthly maintenance and flight charge invoices, billing passengers for flight hours, maintaining passenger documentation and records, preparing executive reports, and support of internal and external audits.	Transportation Director
935	BSC Corp Heli – Rev Adjustment	The difference between actual costs and revenues from billings to the Client Companies is “trued up” each year by allocating it pro rata to the Client Companies based on their share of Total Transportation Service Billings.	Transportation Director

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
783	BSC Use of Corporate Jet	923 – Outside Services Employed	Direct - 529250	Unit price - Per occupied flight hour (variable costs) Office of CEO (fixed costs)
667	BSC Corp Jet Adjustment	923 – Outside Services Employed	Allocated - 529260	Total Transportation Service Billings
904	BSC Costs to Achieve	923 – Outside Service Employed	Direct - 529700	Time and Materials
			Allocated - 529710	Cost Causative Method
794	Transportation As Requested	923 – Outside Service Employed	Direct - 529250	Time and Materials
934	BSC Use of Corporate Helicopter	923 – Outside Services Employed	Direct - 529250	Unit price - Per occupied flight hour (variable costs) Office of CEO (fixed costs)
935	BSC Corp Heli – Rev Adjustment	923 – Outside Service Employed	Allocated – 529260	Total Transportation Service Billings

Responsibilities

Task / Responsibility	EBSC	Client Company
Executive Transportation		
Timely Notification	X	
Transport the client to his/her destination; assist with any bags	X	
Maintain transportation logs	X	
Maintain and provide monthly billing log	X	
Respond to inquiries on corporate jet/helicopter use	X	

BSC Transportation

Appendix A

IT RxQ Technical Services Table

Below is a list of the IT Technical Services required to support, align, and allocate to the IT Portfolio Services Cost model. These are Rate x Quantity services that include Technical Design & Engineering (TD&E) and Technology Operations (Tech Ops) Hardware and Labor costs

Service ID	Service Name	Service Description	Service Owner
401	Linux - Virtual	A service provided to application services, indicating the type of Linux-based server technical infrastructure used by the application. This is considered the standard and most applicable Linux platform. The application team and server engineering team determine the appropriate type and size of the server for the application and business criticality of the application.	VPs, TD&E and Tech Ops
402	Linux - Physical	A service provided to application services, indicating the type of Linux-based server technical infrastructure used by the application. This is considered the standard, and most applicable, Linux platform. The application team and server engineering team determine the appropriate type and size of the server for the application and business criticality of the application.	VPs, TD&E and Tech Ops
403	Mainframe Services	A service provided to administer and schedule the mainframe hosting environment. This is based on the CPU minutes used by the end-users using the application asset.	VPs, TD&E and Tech Ops
404	UNIX High End	A service provided to application services, indicating the type of UNIX-based server technical infrastructure used by the application. The application team and server engineering team determine the appropriate type and size of the server for the application and business criticality of the application.	VPs, TD&E and Tech Ops
405	UNIX Low End	A service provided to application services, indicating the type of UNIX-based server technical infrastructure used by the application. This is considered the low-end of the UNIX platform. The application team and server engineering team determine the appropriate type and size of the server for the application and business criticality of the application.	VPs, TD&E and Tech Ops
406	UNIX Standard	A service provided to application services, indicating the type of UNIX-based server technical infrastructure used by the application. This is considered the standard, and most applicable, UNIX platform. The application team and server engineering team determine the appropriate type and size of the server for the application and business criticality of the application.	VPs, TD&E and Tech Ops

Service ID	Service Name	Service Description	Service Owner
407	Wintel Physical Server	A service provided to application services, indicating the type of server technical infrastructure used by the application. A 'physical' server provides a stand-alone technology platform for an application, when a virtual environment does not support the application. The application team and server engineering team determine the appropriate type and size of the server for the application and business criticality of the application.	VPs, TD&E and Tech Ops
409	Wintel Virtual	A service provided to application services, indicating the type of server technical infrastructure used by the application. The application team and server engineering team determine the appropriate type and size of the server for the application and business criticality of the application.	VPs, TD&E and Tech Ops
411	(User) Login LAN Account	Access to the Exelon Enterprise Data Network, which is a Personal LAN Login User Account, and allows the end user access to the network (including to access cloud-hosted SaaS applications) and the IT Service Desk to report issues and request services. This service includes the costs to manage active directory, enterprise testing & tools, the Service Desk, and service & asset management tools (includes governance and reporting of IT asset information in support of IT billing and other IT services). NOTE: Specialized project testing that is requested outside of standard project work will be billed as an As Requested service.	VPs, TD&E and Tech Ops
412	PC Services – Base	This service includes the software operating system for a personal computer, virtual computer, or a rugged PC, including enterprise desktop tools like Microsoft Office products (Word, PowerPoint, Excel), NitroPro for PDF and other desktop software. Technology refresh expectations apply – see Technology Refresh & Capital Investments/Depreciation description in this Service Catalog. Client Companies own/lease PC hardware, per Technology Refresh Responsibilities.	VPs, TD&E and Tech Ops
417	Remote Access	Access to the Exelon Enterprise Data Network as well as access to registered applications from remote locations or internally leveraging devices other than a traditional personal computer. BSC owns Remote Access infrastructure, per Technology Refresh Responsibilities.	VPs, TD&E and Tech Ops
418 - 423	Depreciation – Shared Infrastructure	Costs of depreciation of shared infrastructure across IT asset classes: 418 - Depreciation Shared Network 419 - Depreciation Shared PC 420 - Depreciation Shared Storage	VPs, TD&E and Tech Ops

Service ID	Service Name	Service Description	Service Owner
		421- Depreciation Shared Telecom 422 - Depreciation Shared UNIX 423 - Depreciation Shared Wintel	
429	Disaster Recovery Program Management	This service provides program coordination for applications with defined Disaster Recovery plans. It includes supporting application teams developing playbooks and facilitating DR exercises.	VPs, TD&E and Tech Ops
431	Virtual Hosting Support	This service provides the day to day operations and support of virtual infrastructure assets installed in the data centers, including IT Operations Center, Tier 2 Operational Support, Infrastructure Base Monitoring, Release and Problem Management, Data Center Management. This is aligned with the Standard Operations Support Model. The assumption is that Basic applications are single server, Standard applications are clustered, and Premium applications are n+1.	VPs, TD&E and Tech Ops
437	Storage	This service provides corporate-owned storage solution for all computing purposes, including but not limited to file shares, applications and database storage for Wintel, LINUX and UNIX environments.	VPs, TD&E and Tech Ops
442	Telephony – Desktop	This service provides an internal Exelon telephone number with access to enterprise audio conferencing and voice mail solutions, if appropriate. Includes non-labor back-end support. Client Company pays directly for circuits and usage. BSC owns central telephony infrastructure supporting infrastructure, per Technology Refresh Responsibilities. Client Company owns responsibility for individual phone systems at their locations.	VPs, TD&E and Tech Ops
443	Unified Communications – Video Conference	Video Conference (VC) Unit Services include services covered under existing maintenance contracts. VC Units include vendor maintenance and on-site support for incidents reported through the Service Desk with an expected response of 8x5 NBD (Next Business Day). This service does not include out of warranty parts and labor which will be billed through the time and material service offering. Support to audio/visual conference equipment is also covered in locations where video conference rooms are also supported. Audio/Visual Conference Rooms are generally not covered under any maintenance contracts. Routine replacement of items such as bulbs/lamps, projectors, screens, displays, and cables are the responsibility of the BU owning the room. BUs wanting full warranty support for these rooms can purchase an agreement separately and will be billed directly. Access to this service is dependent on network capacity at a particular site.	VPs, TD&E and Tech Ops

Service ID	Service Name	Service Description	Service Owner
		BSC owns Video Conference supporting infrastructure, per Technology Refresh Responsibilities. Client Company owns responsibility for individual Video Conference unit, and facilities where video conference is located.	
446	Hosting Operations - Limited	This service includes limited monitoring and Tier 1 notification to the appropriate application or infrastructure team. The cost associated with this effort will be adjusted depending on the number of applications supported. All external applications must be registered in the APM Application Registry to qualify for this service.	VPs, TD&E and Tech Ops
447	Load Balancing	This service provides load balancing for applications (required for High/Gold and available for Medium/Silver/-or Low/Bronze), which allows application teams to distribute the load for an application across multiple server environments.	VPs, TD&E and Tech Ops
448	Mobile Device Support	This service provides software and support to mobile devices to provide and monitor company services, such as email.	VPs, TD&E and Tech Ops
450	Network Operations	This service provides network operations support, including monitoring, support, and compliance.	VPs, TD&E and Tech Ops
451	Data Center Operations	This service includes monitoring and facilities support for data center hosted applications.	VPs, TD&E and Tech Ops
452	Premium Desktop	This service includes the application license and maintenance cost for premium software applications: Adobe, Microsoft Visio and Microsoft Project	VPs, TD&E and Tech Ops
456	Unix Virtual	A service provided to application services, indicating the type of UNIX-based server technical infrastructure used by the application. A 'virtual' server is the preferred environment for applications. The application team and server engineering determine the appropriate type and size of the server for the application and business criticality of the application.	VPs, TD&E and Tech Ops
464	Java App Hosting Services	Hosting services for a java-based application including maintenance and support services on the shared infrastructure.	VPs, TD&E and Tech Ops
465	Storage Backup	This service provides backup service to servers and file shares	VPs, TD&E and Tech Ops
467	Physical Hosting Support	This service provides the day to day operations and support of physical infrastructure assets installed in the data centers, including IT Operations Center, Tier 2 Operational Support,	VPs, TD&E and Tech Ops

Service ID	Service Name	Service Description	Service Owner
		Infrastructure Base Monitoring, Release and Problem Management, Data Center Management. This is aligned with the Standard Operations Support Model.	
468	SQL Server IaaS	Includes SQL Server Standard & Enterprise Edition (all versions), HA, DR, SQL Server Reporting Services, Analysis Services and Integration Services. Covers license software maintenance charges as well as labor required to support all database environments and databases.	VPs, TD&E and Tech Ops
469	SQL Server DBaaS	Includes SQL Server Enterprise Edition (all versions), HA, DR, SQL Server Analysis Services and Integration Services. Covers license software maintenance charges as well as labor required to support all database environments and databases. Also includes TD&E and TechOps server costs. This is a shared environment with other BU applications.	VPs, TD&E and Tech Ops
470	SharePoint - Hosting	Includes license and labor to support the corporate SharePoint platforms (all versions), HA/DR, Monitoring and Backup. Includes storage, server and cloud consumption (for IaaS and Office365) environments	VPs, TD&E and Tech Ops
473	P/SaaS Ops Support	This service provides monitoring and problem management for cloud-hosted solutions.	VPs, TD&E and Tech Ops
474	Web Hosting Premium	This service provides platform support for high complexity websites. The application and engineering teams will determine whether applications warrant this level of support.	VPs, TD&E and Tech Ops
482	Oracle Fusion Middleware	Includes the maintenance and labor to support the Oracle Fusion software for application integration, HA/ DR, Architecture, Engineering, Projects, and Monitoring. Over time, Oracle Fusion middleware will replace Tibco and IBM.	VPs EWS
484	Storage – Array Support	This storage offering is the standard storage offering for OpCo owned storage arrays. These devices still meet I&O standards providing a high- level performance and availability, but are an OpCo, not TD&E, asset. This service is an array- based charge to cover the cost of labor and maintenance but excludes depreciation costs as that is being handled directly by the OpCo.	VPs, TD&E and Tech Ops
490	Oracle Golden Gate	Includes RDBMS (all versions), HA (VCS, RAC), DR (Dataguard, Active Dataguard, Golden Gate), Partitioning, Advanced Compression. Covers license software maintenance charges and all associated depreciation charges as well as the labor required to support all database environments and databases. Also includes TD&E server allocation charges	VPs, TD&E and Tech Ops
491	Oracle Instance	Includes RDBMS (all versions), HA (VCS, RAC), DR (Dataguard, Active Dataguard, Golden Gate), Partitioning, Advanced Compression. Covers license software maintenance charges and all associated depreciation charges as well as the labor required to support all database environments and databases. Also includes TD&E server allocation charges	VPs, TD&E and Tech Ops

Service ID	Service Name	Service Description	Service Owner
492	Oracle Home	Includes RDBMS (all versions), HA (VCS, RAC), DR (Dataguard, Active Dataguard, Golden Gate), Partitioning, Advanced Compression. Covers license software maintenance charges and all associated depreciation charges as well as the labor required to support all database environments and databases. Also includes TD&E server allocation charges	VPs, TD&E and Tech Ops
849	IBM WebSphere Enterprise Integration Services	Service provided to Business Application owners based on usage of the number of IBM Queue Managers, IBM Broker Instances, Java Virtual Machines (JVM), WebSphere Partner Gateway (WPG) Documents and Tivoli Monitoring. This is considered the IBM WebSphere Standard.	VPs, TD&E and Tech Ops
991	Apigee	Platform for API Life Cycle Management. Replaces Layer7 API Gateway	VPs, EWS
992	Boomi	Cloud-based integration platform that enables cloud to cloud or cloud-on-prem integrations. Possible viable replacement for IBM MQ Broker, Tibco and Oracle Fusion technologies	VPs, EWS
996	Telephone Physical	Telephone Physical – Covers services and support associated with physical telephones through PBX or VoIP telephone systems. This includes any telephony device registered to these systems VoIP, analog or digital. Includes services or apps such as paging, fax connections, life / safety devices, call center solutions, menu options and extended services for plant or outside facilities.	VPs, TD&E and Tech Ops
F87	TIBCO Enterprise Integration Services	Includes the license and labor to support the TIBCO Middleware software (all versions), HA/ DR, Architecture, Engineering, Projects, and Monitoring (HP Diag, Hawk, BSM etc.).	VPs, EWS

IT Technical Services

FERC Account and Billing Approach Table

Service ID	Service Name	Major Client FERC Account	Billing Approach	Basis
401	Linux - Virtual	923 – Outside Services Employed	Direct (R*Q) - 529550	# of “compute units” = # CPU + # gb RAM. 0-1999 gb RAM = 1; 2000-2099 gb = 2, etc. e.g., 2CPU + 4gb RAM = 6 “compute units” , Compute units capped at 64mb

402	Linux - Physical	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Servers
403	Mainframe Services	923 – Outside Services Employed	Direct (R*Q) - 529550	CPU Usage (MIPS)
404	UNIX High End	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Servers
405	UNIX Low End	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Servers
406	UNIX Standard	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Servers
407	Wintel Physical Server	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Servers
409	Wintel Virtual	923 – Outside Services Employed	Direct (R*Q) - 529550	# of "compute units" = # CPU + # gb RAM. 0-1999 gb RAM = 1; 2000-2099 gb = 2, etc. e.g., 2CPU + 4gb RAM = 6 "compute units", Compute units capped at 64mb
411	(User) Login LAN Account	923 – Outside Services Employed	Direct (R*Q) - 529550	Count of Active Directory Accounts (LAN IDs)
412	PC Services – Base	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Desktops, Laptops, Virtual PCs, & Rugged PCs
417	Remote Access	923 – Outside Services Employed	Direct (R*Q) - 529550	# virtualized applications
418	Depreciation Shared Network	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Personal AD Accounts
419	Depreciation Shared PC	923 – Outside Services Employed	Direct (R*Q) - 529550	# of PCs
420	Depreciation Shared Storage	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Storage Units across all types
421	Depreciation Shared Telecom	923 – Outside Services Employed	Direct (R*Q) – 529500	# of Telephone Ports
422	Depreciation Shared UNIX/Linux	923 – Outside Services Employed	Direct (R*Q) - 529550	# of UNIX Servers hosting BU-based Applications
423	Depreciation Shared Wintel	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Wintel instances hosting BU-based Applications

429	Disaster Recovery Program Management	923 – Outside services employed	Direct (R*Q) - 529550	# of applications participating in DR Program
431	Virtual Hosting Support	923 – Outside Services Employed	Direct (R*Q) – 529550	# of Servers
437	Storage	923 – Outside services employed	Direct (R*Q) – 529550	# of Gigabytes of Storage
442	Telephone	923 – Outside Services Employed	Direct (R*Q) - 529500	# telephone ports
443	Unified Communications – Video Conference	923 – Outside Services Employed	Direct (R*Q) - 529500	# video conference units
446	Hosting Operations - Limited	923 – Outside Services Employed	Direct (R*Q) – 529550	# of monitoring points
447	Load Balancing	923 – Outside Services Employed	Direct (R*Q) – 529550	# of Applications with Load Balancing
448	Mobile Device Support	923 – Outside Services Employed	Direct (R*Q) – 529550	# of Mobile devices per OpCo
450	Network Operations	923 – Outside Services Employed	Direct (R*Q) – 529550	# of LAN IDs (must also be a consumer of either service 411 and/or service 448)
451	Data Center Operations	923 – Outside Services Employed	Direct (R*Q) – 529550	# of Servers or Network Equipment
452	Premium Desktop	923 – Outside Services Employed	Direct (R*Q) – 529550	# of Adobe, Visio and Project installs
456	Unix Virtual	923 – Outside Services Employed	Direct (R*Q) – 529550	# of Servers
464	Java App Hosting Services	923 – Outside Services Employed	Direct (R*Q) - 529550	# of JVM
465	Storage Backup	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Gigabytes of Backup storage
467	Physical Hosting Support	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Servers
468	SQL Server IaaS	923 – Outside Services Employed	Direct (R*Q) - 529550	# of server Cores
469	SQL Server DBaaS	923 – Outside Services Employed	Direct (R*Q) - 529550	# of SQL databases
470	SharePoint - Hosting	923 – Outside Services Employed	Direct (R*Q) - 529550	# of instances

473	P/SaaS Ops Support	923 – Outside Services Employed	Direct (R*Q) - 529550	# of APM Applications listed as PaaS/SaaS
474	Web Hosting Premium	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Website page views
482	Oracle Fusion Middleware	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Fusion Connectors
484	Storage – Array Support	923 – Outside Services Employed	Direct (R*Q) - 529550	# of Storage Arrays
490	Oracle Golden Gate	923 - Outside Services Employed	Direct (R*Q) - 529550	# Active Gold Gate feeds
491	Oracle Instance	923 - Outside Services Employed	Direct (R*Q) - 529550	# DB Instances
492	Oracle Home	923 - Outside Services Employed	Direct (R*Q) - 529550	# software installations support
849	IBM WebSphere Enterprise Integration Services	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Allocated – 529560	Based on the number of QMANAGERS
991	Apigee	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Direct (R*Q) - 529500	# of connections
992	Boomi	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Direct (R*Q) - 529500	# of connections
996	Telephone - Physical	923 - Outside Services Employed	Direct (R*Q) - 529550	# telephone ports for Cisco/Avaya Phones
F87	TIBCO Enterprise Integration Services	FERC Accounting to be determined with FERC Reporting groups during each individual project creation.	Direct (R*Q) - 529500	# production services deployed in the corporate TIBCO environment.

**PECO ENERGY COMPANY
MUTUAL SERVICES AGREEMENT AND ASSET
TRANSFER AGREEMENT
COST ALLOCATION MANUAL**

Policies and Guidelines
for
Associated Company Transactions
in Accordance
with
the Mutual Services and Asset Transfer Agreement

March 2009

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SECTION I

INTRODUCTION AND CORPORATE STRUCTURE

A. SCOPE

This Mutual Services Agreement (“MSA”) and Asset Transfer Agreement Cost Allocation Manual (“Manual”) applies to transactions between PECO Energy Company (“PECO”) and the Exelon Entities (as defined in Section II).

In previous years, transactions between PECO and the Exelon Entities were governed by the PUHCA rules of the SEC. After PUHCA 1935 was repealed effective February 8, 2006, these transactions were subject to the MSA. The MSA rules generally require such transactions to be priced at cost.

In 2008, the Federal Energy Regulatory Commission (FERC) issued new pricing rules for affiliate transactions involving non-power goods and services. The provision of non-power goods and services, including any goods, equipment (including machinery), materials, supplies, appliances, or similar property (including oil, coal, steam, but not including electric energy, natural or manufactured gas, utility assets, intangible property, or tangible assets such as real property, buildings, and the like) will be subject to the following pricing:

-) For services provided by PECO to another affiliate (except to another state-regulated utility), the pricing standard is the higher of Fully Distributed Cost or Fair Market Value.
-) For services provided by another affiliate (except by another state-regulated utility or EBSC) to PECO, the pricing standard is the lower of Fully Distributed Cost or Fair Market Value.
-) EBSC will charge Fully Distributed Cost to all affiliates.
-) Services between PECO and ComEd will be priced at Fully Distributed Cost, except that if there is a Prevailing Price for the service, it may only be provided if Fully Distributed Cost equals Prevailing Price.

The overall objective of the Cost Allocation System is to establish cost allocation methodologies that apportion costs between PECO and the Exelon Entities so as to preclude cross-subsidization of the Exelon Entities by PECO customers. Cross-subsidization results under cost-based regulation when the prices of a regulated company’s regulated services improperly reflect the costs of associated activities.

In the event of a conflict between this Manual, the MSA and FERC, the order of priority shall be FERC, MSA, and this Manual.

Each PECO department is responsible for implementation within its organization of the policies and guidelines for associated company transactions set forth in the MSA and this Manual. All intercompany transactions shall be adequately documented. Continual monitoring and internal controls shall be maintained to assure that policy guidelines described in this Manual are observed and that potential or actual deviations are detected and corrected.

Please contact PECO's General Accounting Department and/or BSC's Legal Department to resolve any conflict between this Manual, FERC and the MSA rules.

SECTION II

DEFINITIONS

Set forth below is a definition of terms that are used throughout this Manual.

Acquiring Party: A Party who desires to acquire real property, interests in real property, tangible personal property or intangible assets from a Selling Party.

Client Company: A Party who desires to receive services or goods and has requested another Party to provide services and or goods in accordance with the terms of an Approved Services Agreement.

ComEd: Commonwealth Edison Company, PECO's affiliate.

EBSC: Exelon Business Services Company, LLC.

Exelon Entities: Exelon and all of its subsidiaries other than PECO are Exelon Entities.

Fair Market Value: The resultant price set by an arms-length transaction between a willing buyer and a willing seller, both of whom are adequately informed of the appropriate facts, and neither of whom is under any compulsion to buy or sell.

FERC: Federal Energy Regulatory Commission.

Fully Distributed Cost: Fully Distributed Cost includes the actual direct costs or allocated costs incurred by a Providing Company to provide a service or facility, plus indirect costs and other appropriate overheads. See Section IX, Fully Distributed Cost Method, for a detailed discussion as well as examples of fully distributed cost.

MSA: Mutual Services Agreement approved by the PaPUC under which PECO provides non-power services to Exelon Entities or receives non-power services from Exelon Entities other than EBSC.

PaPUC: The Pennsylvania Public Utility Commission.

Party: Party means each, and Parties means all, of the entities who are from time to time a party to the MSA.

Prevailing Price: In the case of services or facilities provided by ComEd to an Exelon Entity, Prevailing Price will only apply to services or facilities provided for sale to the general public. This includes electric service, service provided under an ICC approved pricing mechanism such as Rate CS, and Competitive Services provided to the general public. Prevailing Price is generally defined as the price that has been charged to the general public. When PECO provides a service or facility to ComEd, Prevailing Price is defined as the price charged to nonassociates if such transactions with nonassociates constitute a substantial portion of PECO's total revenues from such transactions.

Providing Company: A Party who has been requested to, and who is able and willing to, furnish facilities and/or provide services to a Requesting Company under the terms of the MSA.

PUHCA: The Public Utility Holding Company Act of 1935 (“PUHCA”) was enacted in 1935 to combat abuses commonly arising in utility holding companies in the early part of the 1900’s. PUHCA, enforced by the SEC, focused most specifically on the practices of the holding company extracting excessive charges from its regulated utilities for services and of unfairly allocating costs to different utilities in different states. The Energy Policy Act of 2005 repealed PUHCA 1935 effective February 8, 2006, and replaced it with PUHCA 2005.

SEC: Securities and Exchange Commission

Selling Party: A Party who is willing to sell and transfer real property, interests in real property, tangible personal property or intangible assets to an Acquiring Party.

Service Company: Any associate company within a holding company system organized specifically for the purpose of providing non-power goods or services or the sale of goods or construction work to any public utility in the same holding company system. The Service Company (EBSC) provides most administrative and general services to the subsidiaries of Exelon.

SECTION III

TRANSACTIONS INVOLVING THE PROVISION OF SERVICES AND FACILITIES

Transactions involving the provision of services and facilities between PECO and the Exelon Entities (other than services PECO receives from EBSC) will be governed by the following pricing rules:

-) For services provided by PECO to another affiliate (except to another utility), the pricing standard is the higher of Fully Distributed Cost or Fair Market Value.
-) For services provided by another affiliate (except by another utility or EBSC) to PECO, the pricing standard is the lower of Fully Distributed Cost or Fair Market Value.
-) EBSC will charge Fully Distributed Cost to all affiliates.
-) Services between PECO and ComEd will be priced at Fully Distributed Cost, except that if there is a Prevailing Price for the service, it may only be provided if Fully Distributed Cost equals Prevailing Price.

According to the MSA, the provision of services or facilities by PECO to an Exelon Entity, or by an Exelon Entity to PECO, shall be charged to the requesting Exelon Entity at an amount not to exceed the Fully Distributed Cost incurred by the providing Exelon Entity.

For transactions between PECO and ComEd, the Providing Company's Prevailing Price will be limited to not more than Fully Distributed Cost as a means to resolve pricing conflicts between ComEd's Affiliated Interests Agreement (AIA) and the MSA which governs PECO's intercompany transactions. Under the MSA, the pricing of transactions is limited to "no more than cost".

Supporting documentation used in the determination of Fair Market Value or Prevailing Price must be forwarded to PECO's General Accounting Department.

Notwithstanding the state rules, where the FERC rules are more protective of PECO and ComEd, those must be applied. Thus, the pricing rules summarized in the bullet points above take into account both state and FERC rules, and give priority to the more protective FERC rules.

SECTION IV

SALES OF TANGIBLE AND INTANGIBLE PERSONAL PROPERTY

A. GENERAL

The purpose of this section is to assign a monetary value (price), and record all tangible or intangible personal property sold and transferred between PECO and the Exelon Entities.

Parties should evidence their agreement with respect to the sale of tangible or intangible personal property by entering into an agreement or other written memorandum.

For tangible or intangible personal property sales between PECO and the Exelon Entities, the following requires a separate PaPUC approval:

- [For tangible and intangible personal property purchases, sales, leases or exchanges between PECO and the Exelon Entities, a PaPUC approval is required pursuant to 66 Pa.C.S. § 2102. There are no exceptions to this requirement. In addition, if the transaction involves property that is "used or useful in the public service," an additional approval may be required pursuant to 66 Pa.C.S. § 1102. Since each transaction covered under this heading requires that a filing be made with the Commission to obtain § 2102 approval, Legal should be contacted to determine whether the Company should also request § 1102 approval for the transaction.

For sales of FERC jurisdictional facilities (*i.e.*, facilities used for the transmission of electric energy in interstate commerce or sales of electric energy at wholesale in interstate commerce), separate approval by the FERC may be required (notify BSC Legal for guidance).

B. VALUATION OF PROPERTY

The following general principles shall be used to establish a sale price for tangible or intangible personal property transactions.

Sales of tangible or intangible personal property shall be charged by the Selling Party to the Acquiring Party at:

- 1) The fair market value of tangible or intangible personal property to be sold as evidenced by the price at which nonassociated vendors offer the same or similar assets for sale by reference to quoted market prices or the value ascribed to the asset by an independent appraisal or other objective valuation technique.

Or, if no such fair market value is objectively or practicably determinable,

- 2) The historical cost of the asset to the Selling Party, less all applicable valuation reserves (e.g. accumulated depreciation).

The determination of fair market value must be adequately documented to ensure that a

proper audit trail exists.

Supporting documentation used in the determination of prevailing price must be forwarded to PECO's General Accounting Department.

C. SALE OF PROPERTY

-) Contact the appropriate Engineering Department, Life Cycle Management Department or Procurement Department to obtain the procedure for the sale of tangible personal property.
-) Contact PECO's General Accounting Department for all accounting transactions, for historical cost calculations, and to determine any impact the transfer has on ratemaking.
-) Notify PECO's Tax Office for tax implications and to obtain the most favorable tax treatment for any property sale.
-) Notify BSC's Legal Department to review the contract concerning the transfer.
-) Contact the Secretary's Office for:
 -) Approval of the sale by the Board of Directors (Board).
 -) Release of property from any mortgage indenture.

Note: Board approval is required for sales of property over \$10 million; for sales of \$10 million and below, Board action is required only to obtain the mortgage release.

SECTION V

SALES OF REAL PROPERTY

A. GENERAL

The purpose of this section is to assign a monetary value (price), and record all real property sold and transferred between PECO and the Exelon Companies.

Parties should evidence their agreement with respect to the sale of real property by entering into an agreement or other written memorandum.

For real property purchases, sales, leases or exchanges between PECO and the Exelon Entities, a PaPUC approval is required pursuant to 66 Pa. C.S. § 2102. There are no exceptions to this requirement. In addition, if the transaction involves real property with an undepreciated book value of greater than \$50,000, a PUC approval is required pursuant to 66 Pa.C.S. § 1102.

Real property includes the following: land, buildings and other forms of real property.

B. VALUATION OF PROPERTY

The following general principles shall be used to establish a sale price for real property sales between PECO and the Exelon Entities.

Sales of real property shall be charged by the Selling Party to the Acquiring Party at:

- 1) The fair market value of the real property to be sold as evidenced by the price at which nonassociated vendors offer the same or similar assets for sale by reference to quoted market prices or the value ascribed to the asset by an independent appraisal or other objective valuation technique.

Or, if no such fair market value is objectively or practicably determinable,

- 2) The historical cost of the asset to the Selling Party, less all applicable valuation reserves.

The determination of fair market value must be adequately documented to ensure that a proper audit trail exists.

Supporting documentation used in the determination of prevailing price must be forwarded to PECO's General Accounting Department.

C. SALE OF PROPERTY

-) Contact PECO's Real Estate Department to obtain the procedure and approval for the sale of real property.

-) Contact PECO's General Accounting Department for all accounting transactions, historical cost calculations, and to determine any impact the transfer has on current or future ratemaking proceedings.
 -) Notify PECO's Tax Office for tax implications and to obtain the most favorable tax treatment for any property sale.
 -) Notify BSC's Legal Department to review the contract concerning the transfer.
 -) Contact the Secretary's Office for:
 -) Approval of the sale by the Board of Directors (Board).
 -) Release of property from any mortgage indenture.
- Note: Board approval is required for sales of property over \$10 million; for sales of \$10 million and below, Board action is required only to obtain the mortgage release.

SECTION VI

SALES/ACQUISITIONS OF FERC JURISDICTIONAL FACILITIES

Sales and/or acquisitions of “FERC jurisdictional facilities” generally require FERC approval (subject to thresholds). “FERC jurisdictional facilities” are the facilities used for the transmission of electric energy in interstate commerce, sales of electric energy at wholesale in interstate commerce (such as contracts), or existing generation facilities. FERC jurisdictional facilities do not include, for example, vehicles, computers, intangibles, land held for future use and obsolete or used inventory unconnected to the electric system. “Sales” and “acquisitions” include lease transactions. Employees must contact both BSC Legal, PECO Regulatory and the Director of PECO Accounting early in the consideration of any proposed sale/lease/acquisition of FERC jurisdictional facilities.

SECTION VII

WORK ORDERS

The Work Order Form is to be completed by a Providing Company when providing a service or facility to a Client Company. A Work Order Form must be completed for all services provided to Client Companies.

A separate form is not intended to be completed for each specific and separate instance where ongoing services or facilities are involved. It is intended to capture a blanket of services. For example, a Work Order Form would be prepared to provide fleet services for the time period that fleet services are provided. It would not be necessary to complete a Work Order Form for each separate vehicle. If a service or facility is provided for a finite period of time then that should be mentioned on the Work Order Form. If the service is to be provided for an undetermined time period, then the Work Order Form is valid until such time that a cancellation is requested. PECO reviews and updates all Affiliate Level Arrangements and Work Orders on an annual basis.

If at a later date there is a need to expand the scope of services related to an existing Work Order, you may prepare a Work Order Form and indicate on the form that an existing Work Order Form is being revised. Merely indicate the additional services and refer to the existing Work Order number.

Work Order Requirements

1. Each company within the holding company system must have a current Service Agreement signed by a management representative with responsibility for the service received or provided. The same employee cannot sign on behalf of both parties.
2. The Service Agreement should describe the scope of services, billing procedures and allocation methods.
3. Services should be directly charged to one benefiting company whenever possible. When more than one company benefits from a service provided, cost causative allocations must be used to distribute costs in a fair and equitable method.
4. Specific services to be provided must be evidenced by signed work orders and Affiliate Level Arrangements (ALAs) or Service Level Arrangements (SLAs). Work Orders provide the key to where the services are recorded on both the Providing Company's and the Client Company's books. Work orders, ALAs and SLAs should include the following data.
 -) Work order control number (Determined by the Providing Company)
 -) Purchase Order Number of Client Company, if applicable
 -) Name or title of Work Order
 -) Description of work to be performed
 -) Start and completion date
 -) Other Client Companies benefiting from the service (for purposes of allocations)
 -) Allocation factors (if applicable)
 -) Providing Company's code block data to capture costs of work order
 -) Client Company's code block data for billing purposes (including FERC account if for a FERC jurisdictional utility)

-) Budgeted / expected cost to be charged to Client Company
 -) Authorization signatures and dates
5. Changes to work orders must be documented.
 6. The Providing Company must maintain a control log of all authorized work orders.

For services provided by PECO, Work Order numbers will be issued by PECO's General Accounting Department. Therefore, when preparing a Work Order Form, please contact PECO's General Accounting Department.

A copy of the completed, approved Work Order Form must be sent to PECO's General Accounting Department.

Originals of the completed, approved form including any supporting documentation should be kept by the Providing Department. A copy of the Work Order Form should be maintained by the Requesting Department.

Work Order

[
 WO # _____
 ALA Reference No. _____
 Current Date _____
 Effective Period _____

1. Providing Company: _____
 2. Providing Department: _____
 3. Client Company or Companies: _____
 4. Client Department: _____
 5. Project Type (circle one): _____ New Work Order
 6. Work Order Title: _____
 7. Allocation Method: _____

Revised Work Order

8. **Providing** Companies Reclassification Code Block:

Business			Sub		Customer		Operating	Charging	
Unit	Dept	Account	Account	Project	Product	Segment	Unit	Dept	Affiliate
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____

9. **Receiving** Companies Distribution Code Block:

Business			Sub		Customer		Operating	Charging	
Unit	Dept	Account	Account	Project	Product	Segment	Unit	Dept	Affiliate
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____

10. In the space below, describe the services/facilities which will be charged to this Project.

Include budgeted/expected cost to be charged to Client Company.

(attach additional sheets if necessary)

11. Approvals

Requesting Co. Mgr: _____
 (Signature)

 (Print Name)

 (Date)

Approvals

Providing Co. Mgr: _____
 (Signature)

 (Print Name)

 (Date)

Requesting Co. Contact:

_____ Primary
 _____ Secondary

Contact's phone number:

_____ Primary
 _____ Secondary

Accounting Contact:

 _____ (phone #)

Providing Co. Contact:

_____ Primary
 _____ Secondary

Contact's phone number:

_____ Primary
 _____ Secondary

Accounting Contact:

15
 _____ (phone #)

INSTRUCTIONS FOR COMPLETING PECO WORK ORDER FORM

Work order number	The work order number is an eight digit code consisting of the ALA reference number (4 digits) and a 4 digit identifier provided by the PECO General Accounting Department. For example: CP01-0088.								
ALA Reference Number	<p>The ALA reference number is derived as follows: the first digit is the providing company code, the second digit is the receiving company code and the final 2 digits are numeric indicating the number of the ALA between the 2 entities. For example: CP01 where the provider is CED the receiving Company is PED and this is the first ALA between the two entities. ALA reference numbers are 4 digit identifier provided by the CED – Financial Reporting Department. The Company Codes are:</p> <table> <tr> <td>C = CED</td><td>P = PED</td></tr> <tr> <td>E = Enterprises</td><td></td></tr> <tr> <td>G = Genco</td><td>B = BSG</td></tr> <tr> <td>X = Corp. Center</td><td></td></tr> </table>	C = CED	P = PED	E = Enterprises		G = Genco	B = BSG	X = Corp. Center	
C = CED	P = PED								
E = Enterprises									
G = Genco	B = BSG								
X = Corp. Center									
Effective Period	The time period which the Work Order is in effect.								
1. & 3. Providing/Receiving	Select companies providing/requesting services.								
2. Providing Department	Identify the department responsible for providing the work to be done.								
4. Client Department	Identify the department requiring the work to be done.								
5. Work Order Type	One of the two types of Work Orders should be marked. A “New” or a “Revised” Work Order may be selected.								
6. Work Request Title	Choose an abbreviated title to define the work to be provided.								
7. Allocation Method	<p>If the Work Order is for work that will benefit more than one department, indicate the basis of allocation.</p> <p>Refer to Section IX of the Affiliated Interests Agreement, Cost Allocation Methods, for more information on allocation methods.</p>								

7. Providing Company Providing companies reclassification code block to remove
– the charges from their O&Ms to be billed to an affiliate.
Reclass (Debit of reclass JE.)
9. Receiving Company Code block that the receiving company will charge to record
Distribution the cost of monthly ALA services received.
10. Description of Services Brief description of service or facility provided including
budgeted or expected costs to be charged to Client
Company.
11. Approvals Both the Receiving Company and the Providing Company
must indicate their approval by indicating the name and
providing a signature by the appropriate Department Head
or Manager. Responsible contacts should be identified by
complete name and their phone number.

SECTION VIII

FULLY DISTRIBUTED COST METHOD

A. OVERVIEW

Under the fully distributed cost methodology, direct costs incurred by one Party for the provision of services to another Party are increased for indirect costs and other appropriate overheads. The objective is to assign direct costs along with the appropriate indirect costs and overheads to the benefiting Exelon Entity or Entities to prevent cross-subsidization of associates by PECO customers.

B. COMPONENTS OF FULLY DISTRIBUTED COST

Fully distributed cost is the direct costs or allocated costs (cost pools allocated to a Exelon Entity based on a cost causative measure), adjustments to direct labor costs, indirect costs and other appropriate overheads incurred by a Party to provide a service or facility to another Party.

1) **Direct Costs and Allocated Costs**

Direct costs consist of direct labor, direct materials and purchased services, and the direct costs of facilities, equipment, machinery, furniture and fixtures. Allocated costs are incurred for the provision of services or facilities which are not directly assignable to a specific Exelon Entity or Entities but jointly benefit more than one Party. Costs to be allocated shall be accumulated in cost pools and allocated between the appropriate Parties based on an appropriate cost causative measure that ensures an equitable allocation.

2) **Direct Labor Adjustments, Indirect Costs and Other Overheads**

Elements of and the current rate for PECO's Loading Factors are presented below.

Administrative and General Loading Factor 49.6 %

-) Administrative and General Salaries (FERC Acct 920)
-) Office Supplies (FERC Acct 921)
-) Outside Services Employed (FERC Acct 923)
-) Property Insurance (FERC Acct 924)
-) Injuries and Damages (FERC Acct 925)
-) Employee Pensions and Benefits (FERC Acct 926)
-) Regulatory Commission Expenses (FERC Acct 928)
-) Advertising Expenses (FERC Acct 930)
-) Rents and Plant Maintenance (FERC Acct 931 and 935)

Studies to update PECO's Direct Labor Adjustment Rates and the Loading Factors will be performed by PECO's General Accounting Department annually during the second quarter and will be based on actual financial data of the prior calendar year.

The new Direct Labor Adjustment Rates and the Loading Factors will go into effect July 1st of each year.

C. FULLY DISTRIBUTED COST CALCULATION

Different adjustments are applied to direct labor charges depending on which PECO employees are charging payroll to the Exelon Entities and how their time is captured. See example calculations below.

Please note that this Section currently covers only PECO's loading factors for use in its fully distributed cost calculation. If an Exelon Entity provides a service to PECO at its fully distributed cost, then the Exelon Entity would need to calculate its own loading factors.

EXAMPLE CALCULATIONS OF FULLY DISTRIBUTED COST FOR PECO
2008 RATES

LABOR

	<u>Payroll Costs</u>
<u>Direct Charges</u>	
Direct PECO Payroll Charge	\$ 100.00
 Total Direct Labor Charges	 <u>\$ 100.00</u>
<u>Indirect Charges</u>	
1.) Adjust for Fringe, Pension, AIP and Payroll Taxes 79.97%	79.97
2.) Adjust for A&G Loading Rate 49.60%	49.60
3.) Indirect Charges (if appropriate)	<u>0.00</u>
 Adjusted Direct Labor Charges	 <u>\$ 229.57</u>

The Fringe, Pension AIP and Payroll Taxes rates applied in this example were in effect as of 1/31/2009. These rates are updated each month based on a communication sent out by PECO General Accounting.

SECTION IX

COST ALLOCATION METHODS

Whenever possible, costs of services or facilities specifically attributable to a Party should be charged directly to such Party. These services shall be charged directly using the appropriate pricing basis. See Section III, Transactions Involving the Provision of Services and Facilities for more information. When a transaction pertains to one Client Company and the transaction is charged to such Client Company, no further allocation is necessary. For each separately identifiable good or service, a determination needs to be made of those costs that can be directly charged to that particular good or service.

For costs incurred for transactions involving the provision of services which are not directly assignable to a specific Client Company and which have joint benefit to more than one Party, an allocation method must be used to distribute the costs to the benefiting companies. Cost pools will be allocated to the Client Companies based on the respective cost causative measures.

Each Providing Company will have the primary responsibility for ensuring that the allocation factors are proper, accurate and kept up to date.

To the greatest extent possible, the allocation factors will be based on cost drivers specifically applicable to the service provided. PECO Accounting will be advised / consulted regarding allocations factors utilized in associate transactions.

PECO Accounting will be responsible for evaluating new allocation methodologies and determining if any approval is required. PECO Accounting will coordinate approval efforts, if necessary, with the Legal Department.

SECTION X

ACCOUNTING AND INTERCOMPANY BILLING

A. Overview

For PECO and the Exelon Entities, code block must be used to record the accounting distribution for intercompany transactions. The specific accounting varies according to which Exelon Entity is involved in the transaction with PECO and whether the service, facility or goods are being charged at Fully Distributed Cost or market price.

B. Services/Facilities charged at FULLY DISTRIBUTED COST

When the provision of a service is directly assignable to a Client Company and is charged at Fully Distributed Cost, the Providing Company shall charge the related direct and indirect costs to a unique code block combination. The code block combination should be stated on each work order supplied as part of the ALA process.

If costs cannot be directly charged but must be allocated based on a cost causative measure (see Section IX, Cost Allocation Methods), contact PECO's General Accounting Department and Service Company Accounting to determine an appropriate code block combination to 'pool' such costs for allocation to the benefiting companies. [Is this consistent with PECO's practice?]

C. Services/Facilities charged at MARKET PRICE

When a service is provided to a Client Company at the Providing Company's market price rather than its Fully Distributed Cost, the Providing Company must record both its expenses associated with the provision of service and the related intercompany revenues. The Client Company will record the intercompany expenses.

D. Accounting for direct labor costs

Positive time reporting methodology should be utilized. Under a positive time reporting methodology, an employee shall report in each pay period the number of hours in providing separately identifiable goods and services to Client Companies.

PECO employees prepare Weekly Time Reports to report the hours spent providing a service to a particular Party to an appropriate code block combination. These Weekly Time Reports are signed by both the employee and an appropriate supervisor who can attest that the time reported is accounted for accurately. All hours billed must be supported by timesheets.

When billing direct labor costs the fully distributed cost methodology should be utilized. Under the fully distributed cost methodology, direct costs incurred by one Party for the provision of services to another Party are increased for indirect costs and other appropriate overheads. The

objective is to assign direct costs along with the appropriate indirect costs and overheads to the benefiting Exelon Entity or Entities to prevent cross-subsidization of associates by PECO customers.

Fully distributed cost are the actual labor costs plus the addition of applicable overheads (Fringes, AIP, Pension, Payroll Tax and A&G factor). All applicable overhead rates are distributed monthly prior to the start of the accounting close. The Fringe, AIP, Pension and Payroll Tax rates are established at the beginning of the year based on budgeted costs, there are adjustments on a monthly basis to the secondary rates of the respective allocation rates. The A&G rate is updated yearly based on actual financial data of the prior calendar year. The rate is updated in June by the General Accounting Department as part of PECO's development of its billing rates.

E. ACCOUNTING ON PAYMENT DOCUMENTS, MATERIAL REQUISITION, JOURNAL ENTRIES, ETC.

Costs incurred for services provided to an Exelon Entity, which are paid by means of a PECO Payment Request should be charged to such Exelon Entity by entering the appropriate code block combination on the accounting distribution line. Enter the appropriate code block combination in the Journal Entry System, the Passport System, Transportation System and any other system used for transactional reporting.

When using a journal entry to correct for any historical payroll charges to a Client Company, use the appropriate sub accounts. This is necessary so that the correct labor adjustments, indirects and overheads are added.

F. INTERCOMPANY BILLINGS AND PAYMENTS

1) Billings

-) Tariffed services provided by PECO to an Exelon Entity will be billed to the Exelon Entity in the same manner as all other customers of the tariffed service (e.g. Exelon Generation will be sent a PECO electric bill for electric service).
-) All other services or facilities which are provided by PECO to Exelon Entities, whether charged at market price or at fully distributed cost, will be invoiced and billed by PECO's functional area. PECO will separately invoice each of the Exelon Entities on a monthly basis for the services and facilities provided to the respective Exelon Entity during such month. Each invoice will include descriptions of the charges by reference to the Work Orders, if applicable, as well as total indirects calculated on all direct costs billed during the month. Upon request, an explanation and/or documentation will be provided to justify charges.

- J) Services or facilities which are provided by the Exelon Entities to PECO, whether charged at market price or at fully distributed cost, will be invoiced and billed by each respective Exelon Entity. PECO will be invoiced from each of the Exelon Entities on a monthly basis for the services and facilities provided by the Exelon Entities during such month. Each invoice will include descriptions of the charges by reference to the Work Orders and total indirects, if applicable, calculated on all direct costs billed during the month. Upon request, an explanation and/or documentation will be provided to justify charges.
- J) PECO's Real Estate Department will be responsible for collecting the payment from the Exelon Entity for the sale of real property, which is due at the closing of the sale and transfer of the property. Real Estate must communicate the accounting information related to the property sale to PECO's General Accounting Department.

2) **Payments**

With the exception of real property and intangible asset sales, payments from Exelon Entities should be made in accordance with Exelon's Intercompany Cash Settlement Policy.

G. INTERNAL CONTROL RESPONSIBILITIES AND RECORD RETENTION

Each PECO department that enters into an associated company transaction subject to the MSA shall have primary responsibility for assuring that the policies and guidelines detailed in the MSA and this Manual are appropriately implemented and maintained.

Also, each PECO department shall establish unique code block elements in the general ledger system, which shall be used to record, associated company transactions.

PECO's General Accounting Department shall have responsibility, in addition to those responsibilities indicated elsewhere herein, for overall monitoring of procedures and controls associated with associated company transactions. In this role, an accountant will monitor Work Order Forms, transactions, billings, allocation methodologies, etc. to assure compliance with the MSA and this Manual or any other applicable manuals, and that actions will be taken to correct deficiencies as they are identified. Reviews will be performed of operating results to assure they properly reflect associated company transactions that occurred during the period reviewed based on known activity as obtained from completed Work Order Forms and other sources. PECO's General Accounting Department shall direct any participant to implement and/or revise any procedure as required to assure associated company transactions are carried out in accordance with the provisions and intent of the MSA and this Manual or any other applicable manuals.

Internal Audit will also perform periodic compliance reviews of the associated company transaction processes to further provide assurance regarding the actual operating effectiveness of the policies and guidelines as outlined in the MSA and this Manual or any other applicable manuals.

Supporting documentation for intercompany transactions will be retained per the record retention schedule.

SECTION XI

BUDGETING

The goal of the budget cycle is to develop a corporate budget for the entire Exelon organization that accurately reflects the activities performed and the resources necessary to accomplish those activities. A great deal of interactive communication needs to occur not only among the various departments within a company but also between the companies. Two-way communication should be ongoing throughout the budget cycle.

This section provides budget guidelines only with respect to transactions between PECO and the Exelon Entities.

PECO and the Exelon Entities shall be responsible for preparing their own budgets for revenues, capital and operating expenditures and employee headcount. Providing Companies are also responsible for renewing or revising Affiliate Level Arrangements and Work Orders for the upcoming budget period that will provide the basis for preparing annual budgets. These Affiliate Level Arrangements and Work Orders will provide details of the direct costs of services to be provided to Client Companies.

Budgeting for the costs of facilities and services provided by PECO to an Exelon Entity will depend on whether the Exelon Entity will be charged PECO's fully distributed cost or PECO's market price for such facility or service.

If PECO is providing a service at its fully distributed cost, then such costs will be the budget responsibility of the Exelon Entity receiving the service. The PECO department providing the service will still be responsible for preparing or revising Affiliate Level Arrangements and Work Orders.

If PECO is providing a service at its market price, then the PECO Business Unit must budget for both the revenues and expenses (including any applicable overheads charged on PECO's books) associated with the provision of the services. The PECO department providing the service will be accountable for the profit or loss on the service they provide and the Exelon Entity will have budget responsibility for the market price of the service provided.

[Insert effective years in the format of year-year] Affiliate Level Arrangement–ALA¹ No. [enter ALA/SLA number]²

Affiliate Level Arrangement (“ALA”)¹ between [insert provider business unit full company name – Area/Department providing service] (“[insert provider business unit abbreviated name]”) and [insert receiver business unit full company name] (“[insert receiver business unit abbreviated name]”)

Purpose

The purpose of this ALA¹ is to **[Insert a high-level summary of the business objectives that the providing business unit is intended to address. An overview of the services covered by the ALA¹ should be presented. An overall description of the contents of the ALA should be discussed.]**

Governing Agreement

This Affiliate Level Arrangement (“ALA”)¹ is governed by the provisions of the **[insert governing agreement of the provider]³ or [insert governing agreement of the receiver]³.**

Terms and Conditions

This document commences on **[insert date in the format of month day, year]** and extends until the end of **[insert year]**.

Scope of Services

This document constitutes an arrangement between the **[insert receiver business unit]** and **[insert provider business unit]** for the **[insert a high level description of the service]**. This document specifies the service expectations between **[insert provider business unit]** and **[insert receiver business unit]** and provides:

- A description of the service to be delivered
- The billing approach for the services
- The metrics by which the effectiveness of the services is monitored
- The roles and responsibilities of both parties

This document has been reviewed by **[insert provider business unit]** and **[insert receiver business unit]** Accounting, **[insert Area/Department providing service]**, and Legal including a review for compliance with regulatory provisions, if any.

Scope of Services
(Provide a detailed breakdown of the scope of services provided)

Service Responsibility Matrix

(Provide a breakdown of responsibilities between the Service Provider, the Customer, and any 3rd parties, which must be honored in order for the services to be provided.)

Services, Tasks	(Service Provider)	(Customer)
(List Service)		
(List Breakdown)		
(List Service)		
(List Breakdown)		
(List Service)		
(List Breakdown)		

Service Costing Schedule

Rules of Costs to be Billed:

This section provides rules of costs to be billed by provider of services to receipt of services.

Provider of Services									
	ComEd	PECO	BGE	Genco	DPL	ACE	PEPCO	PHISCO	BSC
Recipient of Services									
ComEd	N/A	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	See GSA and SLA ¹
PECO	Fully Distributed Cost ^{4,5}	N/A	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	N/A	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	See GSA and SLA ¹
BGE	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	N/A	Lower of Fully Distributed Cost ⁴ or FMV ⁶	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	See GSA and SLA ¹
Genco	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	N/A	Higher of Fully Distributed Cost or FMV ⁶	Higher of Fully Distributed Cost or FMV ⁶	Higher of Fully Distributed Cost or FMV ⁶	Higher of Fully Distributed Cost or FMV ⁶	See GSA and SLA ¹
DPL	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	N/A	See PHI CAM	See PHI CAM	See PHI CAM / Service Agreement	See GSA and SLA ¹
ACE	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	See PHI CAM	N/A	See PHI CAM	See PHI CAM / Service Agreement	See GSA and SLA ¹
PEPCO	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	See PHI CAM	See PHI CAM	N/A	See PHI CAM / Service Agreement	See GSA and SLA ¹
PHISCO	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	See PHI CAM	See PHI CAM	See PHI CAM	N/A	See GSA and SLA ¹
BSC	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Lower of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	N/A

Provider of Services									
	ComEd	PECO	BGE	Genco	DPL	ACE	PEPCO	PHISCO	BSC
Recipient of Services									
ComEd	N/A	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	See GSA and SLA ¹
PECO	Fully Distributed Cost ^{4,5}	N/A	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	N/A	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	See GSA and SLA ¹
BGE	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	N/A	Lower of Fully Distributed Cost ⁴ or FMV ⁶	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	See GSA and SLA ¹
Genco	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	N/A	Higher of Fully Distributed Cost ⁴ or FMV ⁶				See GSA and SLA ¹
DPL	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	N/A	See PHICAM	See PHICAM	See PHICAM	See GSA and SLA ¹
ACE	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	See PHICAM	N/A	See PHICAM	See PHICAM	See GSA and SLA ¹
PEPCO	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	See PHICAM	See PHICAM	N/A	See PHICAM	See GSA and SLA ¹
PHISCO	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Fully Distributed Cost ^{4,5}	Lower of Fully Distributed Cost ⁴ or FMV ⁶	See PHICAM	See PHICAM	See PHICAM	N/A	See GSA and SLA ¹
BSC	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Lower of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	Higher of Fully Distributed Cost ⁴ or FMV ⁶	N/A

Charging Table:

Select one cost method per service/transaction.

Service/Transaction	Fully Distributed Cost ⁶	Prevailing Price ⁵	FMV ⁶
(List Service/Transaction)			
(List Service/Transaction)			

Monthly Billing Table:

This section provides a monthly cost estimate for *[insert customer]* based on estimated transaction volumes.

Service/Transaction	Estimated Transactions Per Month (Quantity)	Billing Per Transaction (Rate)	Estimated Monthly Billing
(List Service/Transaction)			
(List Service/Transaction)			
(List Service/Transaction)			
(List Service/Transaction)			
		Total	

Performance Metrics & Performance Reporting

(Describe the specific criteria, which will be used to measure the performance of the services provided.)

Process Performance Metrics	Performance Target	Reporting Frequency

Customer Service Performance Metrics ⁷	Performance Target	Reporting Frequency

Signatures			
<p>[insert name of VP/Director/Manager in the format of First, Last] [insert title] [insert provider business unit company name]</p>		<p>[insert affiliate name of VP/Director/Manager in the format of First, Last] [insert title] [insert affiliate business unit company name]</p>	
<p>_____ Signature</p>		<p>_____ Signature</p>	
<p>_____ Date</p>		<p>_____ Date</p>	

Appendix A – Work Order

[work order template to be added]

Endnotes to Template

¹**ALA/SLA:** Affiliated Level Agreement (ALA) if the providing company is ComEd, PECO, BGE, or Genco. Service Level Agreement (SLA) if the providing company is BSC.

²**ALA Number:** The ALA reference number is derived as follows: the first digit is the providing company code, the second digit is the receiving company code, and the final 2 digits are numeric, indicating the number of the ALA between the 2 entities. For example: PC01, where the provider is PECO, the receiving company is ComEd and this is the first ALA between the two entities. The Company codes are:

B = BSC	M = BGE
C = ComEd	P = PECO
G = Genco	A = ACE
D = DPL	E = PEPCO
S = PHISCO	

Note that the ALA can be among more than 2 entities. If that is the case, digits are added so that all company codes are represented.

³**Governance:** This section should reference the governance of both the provider and the receiver.

ComEd – The governance is the Affiliated Interest Agreement (“AIA”) and the Cost Allocation Manual (“CAM”) as approved by the Illinois Commerce Commission, as appropriate.

PECO – The governance is the PECO Mutual Services Agreement (“MSA”) and the Cost Allocation Manual (“CAM”) as filed with or approved by the Pennsylvania Public Utility Commission, as appropriate.

BGE – The governance is the General Services Agreement (“GSA”) and the BGE Cost Allocation Manual (“CAM”), both as filed with Maryland Public Service Commission.

Genco – Genco is not regulated at the state level. However, Genco is regulated by FERC and would be subject to FERC’s rules on what can be charged for services between affiliates.

BSC – The governance is the General Services Agreement (“GSA”) and the BSC Cost Allocation Manual (“CAM”).

ACE, DPL, Pepco and PHISCO – The governance is the PHI Cost Allocation Manual (“PHI CAM”), as approved by the New Jersey Board of Public Utilities (“NJPU”) and as filed with the Delaware Public Service Commission (“DEPSC”), the District of Columbia Public Service Commission (“DCPSC”) and the Maryland Public Service Commission (“MPSC”),

⁴**Fully Distributed Cost:** Fully Distributed Cost includes the actual direct costs or allocated costs incurred by a Providing Company to provide a service or facility, plus indirect costs and other appropriate overheads.

⁵ **Prevailing Price:** Services will be priced at Fully Distributed Cost, except that if there is a Prevailing Price for the service, it may only be provided if Fully Distributed Cost is equal to or less than the Prevailing Price. Prevailing Price is generally defined as the price that has been charged to the general public. In the case of services or facilities provided by ComEd to an Exelon Entity, Prevailing Price will only apply to services or facilities provided for sale to the general public. This includes electric service, service provided under an ICC approved pricing mechanism such as Rate CS, and Competitive Services provided to the general public.

⁶ **Fair Market Value:** The resultant price set by an arms-length transaction between a willing buyer and a willing seller, both of whom are adequately informed of the appropriate facts, and neither of whom is under any compulsion to buy or sell.

⁷ **Customer Service Performance Metrics:** Customer service performance metrics are for Nuclear only.

Q. SDR-OM-16 Please provide the annual level of outside services employees for the preceding three calendar years. Include in your response a breakdown of the test year amount indicating the service provider and the type of service performed.

A. SDR-OM-16 2018 - \$81,465,054
2019 - \$66,459,205
2020 - \$68,849,812
2021 - \$72,315,479
2022 - \$73,412,948

Refer to Attachment SDR-OM-16(a) for the breakdown of the 2020 information by service provider and type of service. For the FTY and FPFTY, PECO does not budget at the FERC account level.

PECO Energy Company
Outside Services (FERC 923)
For the Year Ended December 31, 2020
Presentation Basis - Electric Distribution ONLY

Function	Service	Vendor	Total (\$)	
BSC	IT Non-Telecom Services	BSC	16,033,934	
	Financial Services	BSC	11,624,079	
	Business Center Services	BSC	8,260,072	
	Legal Gov Services	BSC	5,807,244	
	Security Services	BSC	5,572,483	
	HR Services	BSC	5,403,237	
	Executive Services	BSC	3,710,932	
	Regulatory & Governmental Services	BSC	1,275,020	
	Communication Services	BSC	937,925	
	Real Estate Services	BSC	364,108	
	Supply Services	BSC	83,159	
BSC Total			59,072,194	
Contracting, Professional	Accounting and Actuary Governmental, Legal & External Affair	KPMG LLP	121,072	
		MORGAN, LEWIS & BOCKIUS,LLP	399,690	
		BLANK ROME LLP	285,201	
		GRIESING LAW LLC	123,039	
		HOLLAND & KNIGHT LLP	91,302	
		DILWORTH PAXSON LLP	90,933	
		STEPTOE & JOHNSON	64,610	
		LITTLER MENDELSON PC	60,906	
		PAISNER LITVIN LLP	37,398	
		REED SMITH LLP	35,837	
		SAUL EWING LLP	31,000	
		KIRKPATRICK & LOCKHART PRESTON	30,699	
		BALLARD SPAHR ANDREWS & INGERSOLL LLP	24,217	
		LAW FIRM OF RUSSELL R. JOHNSON	22,709	
		JENNER & BLOCK LLP	17,070	
		GREENBERG TRAURIG LLP	14,614	
		HUNTON ANDREWS KURTH LLP	14,471	
		LAW OFFICES OF MANUELA MORAIS	10,179	
		ALSTON & BIRD	6,419	
		KELLER AND HECKMAN	6,089	
		REGER RIZZO & DARNALL LLP	5,598	
		STRADLEY RONAN STEVENS & YOUNG LLP	4,629	
		BERMAN AND TODDERUD PLLP	2,393	
		JACKSON LEWIS PC	1,370	
		MANAGEMENT APPLICATIONS	1,356	
		DAVIS WRIGHT TREMAINE LLP	1,341	
		VAN NESS FELDMAN	881	
		ALAN SEAGRAVE LAW OFFICE	678	
		VENTANA SYSTEMS INC	335	
		LAW OFFICES OF FREDERICK W PETERS	43	
		BARLEY SNYDER LLP	17	
		Other Professional	THE FELICITY GROUP LTD	124,126
			MCGINLEY CONSULTING GROUP INC	108,517
	ACCENTURE LLP		84,940	
	ITRON NETWORKED SOLUTIONS INC		82,788	
	GANNETT FLEMING VALUATION AND RATE		27,121	
	CROSSPEAK SOLUTIONS		25,473	
	LAFATA CONTRACT SERVICES LLC		9,302	
	JCI SERVICES INC.		8,010	
	FTI Consulting Inc		2,138	
	BERKELEY ASSOCIATES CORP		1,802	
	ESCALENT		963	
	PHILADELPHIA YOUTH NETWORK		922	
	KORN FERRY-US	853		
	Staff Augmentation	PONTOON SOLUTIONS INC	1,554,112	
Contracting, Professional Total			3,537,158	
Contracting, Services	Advertising Services	TIERNEY COMMUNICATIONS	477,547	
		STEPHEN A ALBERTINI	11,588	
		AUMOST LLC	1,443	
	Communication & Publication Services	TIERNEY COMMUNICATIONS	100,750	
		VAULT COMMUNICATIONS INC	80,207	

PECO Energy Company
Outside Services (FERC 923)
For the Year Ended December 31, 2020
Presentation Basis - Electric Distribution ONLY

Function	Service	Vendor	Total (\$)
		AUMOST LLC	12,194
		GHAROOA INC	775
	Guard/Security Services	RED COATS INC	687,399
		JR GETTIER & ASSOCIATES	73,377
		AULD & ASSOCIATES INVESTIGATIONS INC	36,632
	IT Services	OLENICK & ASSOC INC	173,582
		TELVENT USA LLC	108,291
		DELOITTE CONSULTING LLP	35,000
		OTHER	29,014
		INFOSYS TECHNOLOGIES LIMITED	28,891
		RSTAR TECHNOLOGIES LLC	27,081
		ENERGY VENTURES ANALYSIS INC.	14,600
		GE GRID SOLUTIONS LLC	2,072
		GOOD EGG MEDIA LLC	93
		ORACLE AMERICA INC	(77,432)
	Janitorial Services	CSI INTERNATIONAL INC	702,222
	Other Services	ABSOLUTE PEST CONTROL	1,423,642
		PAUL RESTALL COMPANY INC	582,897
		ACCENTURE LLP	506,884
		SEL ENGINEERING SERVICES INC	234,072
		DIVERZIFY + LLC	204,577
		PSC INDUSTRIAL OUTSOURCING LP	124,079
		DIVERSIFIED SEARCH LLC	100,277
		TORRES CREDIT SERVICES, INC.	94,092
		RIGHT MANAGEMENT INC	75,115
		HALO BRANDED SOLUTIONS INC	71,329
		IRON MOUNTAIN INFORMATION	69,563
		ABSO	63,431
		MEDTOX LABORATORIES INC	37,715
		THE AYCO COMPANY	32,428
		ATLANTIC RESOURCE PARTNERS PHILADELPHIA LLC	29,462
		NANCY E MIFFLIN	23,250
		BURNS ENGINEERING INC	22,878
		INCOHO CONSULTING LLC	22,052
		DELOITTE CONSULTING LLP	20,080
		LEARNED OPTIMISM LP	18,480
		ABB ENTERPRISE SOFTWARE INC	16,733
		WURZ SIGN SYSTEMS LLC	15,727
		D.J. CASMIRRI FOOD SERVICE	15,113
		CLEARRESULT CONSULTING INC	14,150
		CHOCTAW-KAUL DISTRIBUTION CO	13,798
		WIDENER BURROWS & ASSOCS INC	13,369
		ALL GIRLS TRANSPORTATION & LOGISTICS INC	11,287
		TONSA FENCE LLC	10,549
		C ERICKSON & SONS INC	9,965
		CYBERGRANTS LLC	9,172
		EDISON ELECTRIC INSTITUTE-EEI	8,316
		REPUBLIC SERVICES NATIONAL ACCOUNTS LLC	7,976
		BLAIR PARK SERVICES LLC	7,304
		PAT THOMAS TOURS	3,103
		HAYE CONSTRUCTION SERVICES	2,988
		TEK SYSTEMS, INC.	2,635
		PROFESSIONAL ON-SITE TESTING	2,160
		UTILITIES INTERNATIONAL INC	1,003
		RETTEW ASSOCIATES INC	966
		MEDIUS & ASSOCIATES INC	770
		MICHAEL J BARTH	494
		OTHER	(208,746)
Contracting, Services Total			6,240,460
Grand Total			68,849,812

- Q. SDR-OM-17 Please describe each budgeted or planned cost savings program to be implemented during the present and subsequent year. Please identify the cost of implementing the program and the anticipated annual savings.
- A. SDR-OM-17 PECO has limited the increase in O&M expense, adjusted for major storms, to 2.5% annually from 2019, when its current base rates became effective, through 2022. The increase in O&M expense is 1.4% annually over the same period after adjusting for O&M increases related to customer reliability improvements under the Long Term Infrastructure Improvement Plan (LTIIP), additional make ready work for the deployment of new technologies, and COVID related bad debt expense. Savings have been embedded through the Company's budgeting process which is designed to control O&M growth and provide funding to achieve operational goals and regulatory mandates. Examples of cost management improvement initiatives that have helped contain O&M growth are discussed in the direct testimony of Robert J. Stefani, PECO Statement No. 2.

Q. SDR-OM-18 Please explain how the Company has treated reserve accruals and balances for ratemaking purposes and provide the requested level of any self-funded reserve accruals by type of item (e.g. injuries and damages).

A. SDR-OM-18 For details, refer to PECO Statement No. 2, the direct testimony of Robert J. Stefani, and PECO Statement No. 3, the direct testimony of Michael J. Trzaska.

The Company's rate base claim is not based on a reserve accrual or balance methodology. For example, the Company's plant in service claim for the FPFTY (2022) is based on December 31, 2020 original cost plant balances, adjusted for plant additions expected to be placed in service during the FTY and the FPFTY.

The budgeted levels were adjusted appropriately to reflect known and measurable changes anticipated to occur within the FTY and the FPFTY or, with respect to wage and salary increases, shortly after the end of the FPFTY.

The Company's ratemaking claims are based on normalized levels of expense and revenue using the Company's budgeted test year data representing an estimate of the level of revenue and expense that will be incurred during the future test year ending (FTY) December 31, 2021 and during the fully projected future test year (FPFTY) ending December 31, 2022, and not reserve accruals or balances.

Q. SDR-OM-19 Submit a listing of all amortization claims included in the total operation and maintenance expenses. Include the following information:

- a. Total expense being amortized.
- b. Length of amortization (months or years).
- c. Remaining unamortized balance.
- d. Commission Docket where amortization initially claimed or approved.

A. SDR-OM-19 Refer to Exhibits MJT-1 and MJT-2 and PECO Statement No. 3, the direct testimony of Michael J. Trzaska, for detail regarding Energy Efficiency and Demand Response regulatory programs, and COVID-19 Related Incremental Uncollectible Expense Regulatory Asset, and the treatment of the related amortization claims in the revenue requirement model. Refer to SDR-GEN-2 for the most recent FERC Form 1, page 232, for further detail regarding these and other programs not discussed in the direct testimony of Michael J. Trzaska.

- Q. SDR-OM-20 Provide the total amount of pension expense included in the future test year and explain the basis for the claim (e.g. FASB 87 or ERISA). Include a schedule of actual payments to the pension fund for the past five years.
- A. SDR-OM-20 Pension costs for financial reporting purposes are based on ASC 715 (formerly FAS 87) and the total ASC 715 costs are allocated to capital and expense. The pension expense for electric distribution in 2021 and 2022 are \$1,502,000 and \$(2,795,000), respectively.
- The ratemaking expense claims of \$9,915,000 in the FTY and \$8,904,000 for the FPFTY are based upon a five-year average of the expense portion of pension contributions. The Company considers various factors when making pension funding decisions, including actuarially determined minimum contribution requirements under the Employee Retirement Income Security Act of 1974, as amended (ERISA) and contributions required to avoid benefit restrictions and at-risk status as defined by the Pension Protection Act of 2006 (the Act). Refer to Attachment SDR-OM-20(a) for further explanation of this claim.
- Refer to Attachment SDR-OM-20(b) for a schedule of actual payments to the pension fund associated with the electric distribution business for the past five years.

PECO - Electric Operations
Before The Pennsylvania Public Utility Commission
Future Test Year Ended December 31, 2021
(\$ in Thousands)

		[1]	[2]	[4]	[5]
Line No	Description	Reference	Amount	Amount	Total
<u>PENSION COSTS</u>					
1	Pension Contribution in (per Towers Watson)				
2		2017	\$ 23,545		
3		2018	\$ 28,031		
4		2019	\$ 26,339		
5		2020	\$ 18,006		
6		2021	\$ 15,596		
7	Average Pension Contribution	Sum (L2 to L6) / 5	\$ 22,303		
8	Percent to Electric Distribution		<u>76.26%</u>		
9	Total Amount to Electric Distribution	L7 * L8		\$ 17,008	
10	Pension Capitalization Factor		<u>41.71%</u>		
11	Pension Contribution To Be Capitalized	L9 * L10		<u>\$ 7,094</u>	
12	Pension Contribution To Be Expensed	L9 - L11			<u><u>\$ 9,915</u></u>

PECO - Electric Operations
Before The Pennsylvania Public Utility Commission
Fully Projected Future Test Year Ended December 31, 2022
(\$ in Thousands)

		[1]	[2]	[4]	[5]
Line No	Description	Reference	Amount	Amount	Total
<u>PENSION COSTS</u>					
1	Pension Contribution in (per Towers Watson)				
2		2018	\$ 28,031		
3		2019	\$ 26,339		
4		2020	\$ 18,006		
5		2021	\$ 15,596		
6		2022	\$ 12,181		
7	Average Pension Contribution	Sum (L2 to L6) / 5	\$ 20,031		
8	Percent to Electric Distribution		<u>76.26%</u>		
9	Total Amount to Electric Distribution	L7 * L8		\$ 15,275	
10	Pension Capitalization Factor		<u>41.71%</u>		
11	Pension Contribution To Be Capitalized	L9 * L10		<u>\$ 6,371</u>	
12	Pension Contribution To Be Expensed	L9 - L11			<u><u>\$ 8,904</u></u>

PECO Distribution Payments to the Pension Fund
(\$ in thousands)

	2020	2019	2018	2017	2016
Pension	\$ 13,731	\$ 20,086	\$ 21,376	\$ 17,955	\$ 22,710

Q. SDR-OM-21 Please provide a copy of the Company's most recent pension plan actuarial study.

A. SDR-OM-21 Exelon is the sponsor of the Company's pension plans. PECO and Exelon's other subsidiaries participate in the Exelon plans, which employ multiemployer accounting, and which require recording allocated costs and contributions in PECO's financial statements. Exelon's most recent actuarial study, which includes the forecasted allocation of costs and contributions to PECO and Exelon's other subsidiaries, was prepared with data through December 31, 2020 and is dated January 26, 2021.

Refer to Confidential Attachment SDR-OM-21(a), which is the letter that accompanied the actuarial study and contains the sections of the January 26, 2021 study that are applicable to PECO for 2021 and 2022. Note that information related to Exelon's other subsidiaries has been redacted from Attachment SDR-OM-21(a).

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CONFIDENTIAL INFORMATION THAT IS PROVIDED ONLY IN
THE NON-PUBLIC VERSION OF THE FILING WITH THE
COMMISSION.**

Q. SDR-OM-22 Provide the following information with regards to the claim for rate case expenses:

- a. A description of the estimated rate case expenses.
- b. An explanation of and the supporting rationale for the claimed normalization period.
- c. Provide a summary detailing expenses incurred to date. Update this response as additional invoices are received.

A. SDR-OM-22

- a. Refer to PECO Exhibits MJT-1 and MJT-2, Schedule D-7, and PECO Statement No. 3, the direct testimony of Michael J. Trzaska.
- b. The Company projects that it will need to file another rate case in three years, which formed the basis for the three-year normalization period.
- c. Refer to the table below for the summary showing the Company's 2021 Electric Rate Case expenses incurred as of February 28, 2021.

2021 Electric Rate Case Expense through February 28, 2021

Legal Support	\$50,171
IT Support	-
Contracting Support	62,946
	<hr/>
	\$113,117

Q. SDR-OM-23 Supply the following information for the last five base rate filings:

- a. Docket No.
- b. Date filed.
- c. Dates rates became effective.

A. SDR-OM-23 Refer to the information below for the applicable electric base rate cases:

<u>Docket No.</u>	<u>Date Filed</u>	<u>Rate Effective Date</u>
R-2018-3000164	3/30/2018	1/1/2019
R-2015-2468981	3/27/2015	1/1/2016
R-2010-2161575	3/31/2010	1/1/2011
R-891364	7/21/1989	4/20/1990
R-850152	9/27/1985	6/27/1986

Q. SDR-OM-24 Please provide a comparison of the estimated rate case expenses reflected in the Company's filing with the actual expenses incurred by the Company's last two rate cases according to the same categories.

A. SDR-OM-24 Refer to PECO Exhibit MJT-1, Schedule D-7, page 72 for the estimate of rate case expenses included in the Company's filing.

Actual rate case expenses for the Company's previous base rate case at Docket No. R-2018-3000164, which was filed in March 2018, are provided below:

	(Thousand \$)
External Consultants	\$112
External Legal	1,316
Materials, IT Costs	46
Travel, Copies, etc.	3
Total	\$1,477

Actual rate case expenses for the Company's previous base rate filed in March 2015 (Docket No. R-2015-2468981) are provided below:

	(Thousand \$)
External Consultants	\$289
External Legal	772
Materials, IT Costs	118
Travel, Copies, etc.	150
Total	\$1,329

Q. SDR-OM-25 Please explain what assumptions are made in the projected expenses for the FTY with regard to the level or number of employee vacancies. For example, are all budgeted positions assumed to be filled or is an historical average level of vacancies reflected?

A. SDR-OM-25 The Company includes labor changes in the budget for estimated vacancies throughout the year based on recent trends and current resource staffing plans. The Company's budget data is used as the basis for its future test year and fully projected test year employee expense claims. Please refer to PECO Statement No. 3, the Direct Testimony of Michael J. Trzaska.

Q. SDR-OM-26 Please identify all budgeted employee positions for the FTY which are not currently filled. For each position, provide the wage expense included in the FTY, whether the position is a new position or a position vacated by the departure or transfer of a previous employee, and the date at which the position is expected to be filled.

A. SDR-OM-26 There are 140 budgeted distribution employee positions for the FTY that were not filled as of 1/31/2021.

Work Type	# of Open Positions	Wage Exp in Budget	Status	Expected Date to Be Filled By
Field Ops	81	\$ 8,315,059	New and Vacated	Dec-21
Customer Ops	3	\$ 256,160	New and Vacated	Dec-21
Back Office/Support	56	\$ 5,987,966	New and Vacated	Dec-21
Total	140	\$ 14,559,185		

The majority of open positions in the Field Ops work group will be filled by members of the Aerial Line school, Advanced Hire Line school, Underground Splicing school, and three Operator schools in 2021. Back Office and Support open positions include openings that support existing baseline work and various capital expansion projects.

- Q. SDR-OM-27 Please provide the following labor data for the preceding three calendar years and the current year-to-date including monthly data for most recent twelve months.
- a. Number of budgeted and actual employees broken down between category type used by the Company (e.g. union, non-union, salaried, hourly, temporary, etc.);
 - b. Regular payroll broken down between expensed, capitalized, and other;
 - c. Overtime payroll broken down between expensed, capitalized, and other
 - d. Temporary payroll broken down between expensed, capitalized, and other; and
 - e. Other payroll (specify) broken down between expensed, capitalized and other.

- A. SDR-OM-27 Refer to Table 1 in Attachment SDR-OM-27(a) for a comparison of PECO's actual and budgeted electric distribution employee headcount at December 31, 2018 and at December 31, 2019 and monthly for calendar year 2020 and YTD (January 2021).

Refer to Table 2 in Attachment SDR-OM-27(a) for PECO's actual electric distribution employee headcount shown separately for (1) salaried and hourly employees; and (2) unionized and non-unionized employees.

Please refer to Attachment SDR-OM-27(b) for Payroll information addressing subparts (b) through (e).

TABLE 1

PECO Actual and Budgeted Electric Distribution Employee Headcount*

*December 31, 2018 & December 31, 2019 & monthly for calendar year 2020, January 2021***Electric Distribution Employees**

	Actual	Budget
2018-12	1,945	1,913
2019-12	1,991	2,085
2020-01	1,957	2,028
2020-02	1,980	2,028
2020-03	1,969	2,025
2020-04	1,975	2,030
2020-05	1,967	2,023
2020-06	1,979	2,049
2020-07	2,014	2,067
2020-08	2,025	2,065
2020-09	2,020	2,082
2020-10	2,012	2,077
2020-11	2,012	2,074
2020-12	2,015	2,071
2021-01	2,016	2,061

*Temporary employees are not included in the Company's headcount.

TABLE 2

PECO Actual and Budgeted Electric Distribution Employee Headcount*

Salary and Hourly Employees, Unionized and Non-Unionized Employees

December 31, 2018 & December 31, 2019 & monthly for calendar year 2020, January 2021

	Non-Union		Union		Exempt		Non-Exempt	
	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget
2018-12	959	944	985	969	768	758	1,176	1,155
2019-12	998	1,049	992	1,037	809	852	1,181	1,233
2020-01	969	1,009	988	1,019	782	816	1,175	1,212
2020-02	980	1,007	1,000	1,021	793	816	1,187	1,212
2020-03	982	1,018	987	1,007	797	827	1,173	1,197
2020-04	985	1,020	990	1,010	799	829	1,176	1,201
2020-05	1,005	1,037	962	985	809	836	1,158	1,186
2020-06	1,018	1,057	961	991	820	852	1,159	1,196
2020-07	1,039	1,068	975	999	839	864	1,175	1,203
2020-08	1,043	1,066	983	999	844	864	1,181	1,201
2020-09	1,043	1,072	977	1,009	846	870	1,174	1,212
2020-10	1,040	1,072	972	1,005	841	867	1,171	1,210
2020-11	1,046	1,074	967	1,000	847	869	1,165	1,205
2020-12	1,054	1,078	960	993	853	870	1,161	1,200
2021-01	1,052	1,087	964	975	851	882	1,165	1,179

*Temporary employees are not included in the Company's headcount.

PECO
Distribution Labor Data
(Thousands of Dollars)

		2018 Actual		2019 Actual		2020 Actual
Capital Base Payroll	\$	58,878	\$	76,765	\$	81,892
Capital Overtime		23,981		27,168		33,572
Capital Pensions & Benefits		12,558		17,103		15,879
Expense Base Payroll		121,443		116,756		116,171
Expense Overtime		39,650		35,024		44,027
Expense Pensions & Benefits		26,556		24,859		22,500
Total	\$	283,066	\$	297,675	\$	314,041

Notes: Base payroll includes payroll for temporary employees

Payroll is not available by regular/temporary splits

Q. SDR-OM-28 Please provide a copy of all incentive/bonus plans and provide the level of such expenses for the preceding three calendar years and included in the FTY.

(Specific information by individual should be treated in a confidential manner.)

A. SDR-OM-28 Confidential Attachment SDR-OM-28(a) - 2018 Key Performance Indicators for PECO goal groups.

Confidential Attachment SDR-OM-28(b) - 2018 Annual Incentive Plan for all PECO employees below executive.

Confidential Attachment SDR-OM-28(c) - 2018 Annual Incentive Plan for those represented by a collective bargaining agreement.

Confidential Attachment SDR-OM-28(d) - 2018 Restricted Stock Program.

Confidential Attachment SDR-OM-28(e) - 2018 Long-Term Performance Program.

Confidential Attachment SDR-OM-28(f) - 2018-2020 Performance Share Award Program.

Confidential Attachment SDR-OM-28(g) - 2018-2020 Long-Term Performance Cash Award Program.

Confidential Attachment SDR-OM-28(h) - 2019 Key Performance Indicators for PECO goal groups.

2019 Annual Incentive Plan for all PECO employees below executive.

Confidential Attachment SDR-OM-28(i) - 2019 Annual Incentive Plan for all PECO employees below executive.

Confidential Attachment SDR-OM-28(j) - 2019 Annual Incentive Plan for those represented by a collective bargaining agreement.

Confidential Attachment SDR-OM-28(k) - 2019 Restricted Stock Program.

Confidential Attachment SDR-OM-28(l) - 2019 Long-Term Performance Program.

Confidential Attachment SDR-OM-28(m) - 2019-2021 Performance Share Award Program.

Confidential Attachment SDR-OM-28(n) - 2019-2021 Long-Term Performance Cash Award Program.

Confidential Attachment SDR-OM-28(o) - 2020 Key Performance Indicators for PECO goal groups.

Confidential Attachment SDR-OM-28(p) - 2020 Annual Incentive Plan for all PECO employees below executive.

Confidential Attachment SDR-OM-28(q) - 2020 Annual Incentive Plan for those represented by a collective bargaining agreement.

Confidential Attachment SDR-OM-28(r) - 2020 Restricted Stock Program.

Confidential Attachment SDR-OM-28(s) - 2020 Long-Term Performance Program.

Confidential Attachment SDR-OM-28(t) - 2020-2022 Performance Share Award Program.

Confidential Attachment SDR-OM-28(u) – 2020-2022 Long-Term Performance Cash Award Program.

2021 Incentive information will not be available until April/May.

The incentive/bonus expenses (non-capitalized) allocated for Electric Distribution for 2018-2020 were \$19,985,000, \$19,325,000 and \$22,568,000 respectively.

The incentive/bonus expenses for 2021 and 2022 are \$18,028,000 and \$19,008,000 respectively.

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Q. SDR-OM-29 Please provide the percentage wage rate increases granted by the Company by date and employee classification for the preceding three calendar years and the current year-to-date.

(Specific information by individual should be treated in a confidential manner.)

A. SDR-OM-29 The data below shows the average wages increases for hourly employees and the average merit increases for management employees.

	Average Wage Increase for Hourly Employees	Average Merit Increase Pool for Management Employees
2018	2.5%	2.5%
2019	2.5%	2.5%
2020	2.5%	2.5%
2021	2.5%	2.0%

Contract negotiations for hourly union employees are in progress and are not anticipated to conclude until end of March 2021. Currently the average wage increase for hourly employees is at 2.5%.

Q. SDR-OM-30 Please identify the amount of overtime and show the percent of payroll for each of the two preceding calendar years.

A. SDR-OM-30 Overtime expense as a percentage of payroll is shown below for the two preceding calendar years.

	<u>2019</u>	<u>2020</u>
Overtime (\$1,000's)	\$35,024	\$44,027
OT % of Payroll	23.1%	27.5%

Q. SDR-OM-31 Provide the average starting salary for union, non-union, and the Company as a whole including the supporting calculations.

A. SDR-OM-31 The average starting annual earnings for unionized employees is as follows:

Union (2020) \$53,506*

Union (2021) \$54,844*

Starting wages and salaries for non-unionized employees vary depending on the level of experience and market-reference range for the appropriate job classification. Therefore, a standard starting salary is not available.

*Please see Attachment SDR-OM-31(a) for the calculations supporting the determination of average starting earnings for unionized positions.

Average annual earnings were calculated based on 2,080 hours per work year and average hourly wage rates of \$25.72 and \$26.37 for 2020 and 2021 respectively.

Union

Title	Grade
Billing Consultant	NE1
Customer Service Center Clerk	NE1
Equipment Update Clerk	NE1
Mapping Records Clerk	NE1
Materials Process Clerk	NE1
Meter Process Clerk	NE1
Work Process Clerk	NE1
Corporate Operator (Customer Consultant II)	NE1
Contractor Liaison	NE2
Customer Consultant	NE2
Customer Consultant-PI	NE2
High Bill Consultant	NE3
Small Business Consultant	NE3
Facilities Drafter	NE3
Engineering Assistant	NE3
Lab Tech	NE3
Design & Construction Consultant	NE4
Metering DCC	NE4
Designer	NE4
Maintenance Assistant	NE4
Designer T&S	NE4
Line School Apprentice	P2D
Plant Mechanic B	P2G
Engineering Tech C	P4I
Tech Maintenance C	P4I
Energy Tech (Entry)	P2A
Revenue Protection Technician	P5E
Tool Mechanic	P4H
Equipment Operator Helper	P1A
Truck Driver	P3
Equipment Operator Transportation	P5
General Utility Worker	P2
General Facilities Mechanic	P4
Facilities PM Technician	P5
High Rise Mechanic	P6

Union Average

1/1/2020	
Starting Hourly Wage	Starting Annual Earnings
16.55	\$ 34,424
10.95	\$ 22,776
17.06	\$ 35,485
17.06	\$ 35,485
17.06	\$ 35,485
17.06	\$ 35,485
17.06	\$ 35,485
17.06	\$ 35,485
14.19	\$ 29,515
20.34	\$ 42,307
17.53	\$ 36,462
17.53	\$ 36,462
26.23	\$ 54,558
21.80	\$ 45,344
22.07	\$ 45,906
26.25	\$ 54,600
27.18	\$ 56,534
28.11	\$ 58,469
28.11	\$ 58,469
28.11	\$ 58,469
50.38	\$ 104,790
31.39	\$ 65,291
22.37	\$ 46,530
22.37	\$ 46,530
29.78	\$ 61,942
29.78	\$ 61,942
22.37	\$ 46,530
38.18	\$ 79,414
29.21	\$ 60,757
19.15	\$ 39,832
25.44	\$ 52,915
32.71	\$ 68,037
19.13	\$ 39,790
41.65	\$ 86,632
45.80	\$ 95,264
50.38	\$ 104,790

\$ 25.72	\$ 53,506
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1/1/2021	
Starting Hourly Wage	Starting Annual Earnings
16.96	\$ 35,277
11.22	\$ 23,338
17.49	\$ 36,379
17.49	\$ 36,379
17.49	\$ 36,379
17.49	\$ 36,379
17.49	\$ 36,379
14.54	\$ 30,243
20.85	\$ 43,368
17.97	\$ 37,378
17.97	\$ 37,378
26.89	\$ 55,931
22.35	\$ 46,488
22.62	\$ 47,050
26.91	\$ 55,973
27.86	\$ 57,949
28.81	\$ 59,925
28.81	\$ 59,925
28.81	\$ 59,925
51.64	\$ 107,411
32.17	\$ 66,914
22.93	\$ 47,694
22.93	\$ 47,694
30.52	\$ 63,482
30.52	\$ 63,482
22.93	\$ 47,694
39.13	\$ 81,390
29.94	\$ 62,275
19.63	\$ 40,830
26.08	\$ 54,246
33.53	\$ 69,742
19.61	\$ 40,789
42.69	\$ 88,795
46.95	\$ 97,656
51.64	\$ 107,411

\$ 26.37	\$ 54,844
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Q. SDR-OM-32 Provide the operation and maintenance expense allocation percentage for payroll and benefits.

A. SDR-OM-32 Refer to Attachment SDR-OM-32(a) for the operation and maintenance expense allocation percentage for payroll and benefits.

PECO Energy Company

Presentation Basis: Electric Distribution Only

Payroll Data

(In Thousands)

	2020
Operating and Maintenance Expense	\$ 184,795
Capital	123,500
Balance at end of year	<u>\$ 308,295</u>
Percentage Charged to Operation and Maintenance Expense	59.94%

Benefits Data

(In Thousands)

	2020
Operating and Maintenance Expense	\$ 22,683
Capital	16,324
Balance at end of year	<u>\$ 39,007</u>
Percentage Charged to Operation and Maintenance Expense	58.15%

Notes: (1) Benefits include fringe benefits (Medical, Dental, Vision, 401K, and other benefit plans) and Pension/Post-Retirement benefits.

Q. SDR-OM-33 Provide an explanation of the budgeting process for payroll.

A. SDR-OM-33 Payroll is budgeted based on the headcount reflected in the staffing plans approved by the PECO CEO and Vice President of Human Resources (these approved staffing plans are referred to herein as “Complement”). Prior to being entered in the budget system, that approved Complement is reduced by a vacancy rate for positions that may be unfilled at any point in time over the course of a year. The result is the net headcount, which is entered into the budget system at the department and position level. Next, the current average labor rates are entered into the budget system by job level, as adjusted for projected wage increases. The net headcount and labor rates generate the total payroll. The total payroll is then assigned to specific projects based on the budgeted work plan. A final check then takes place to ensure the net headcount at the department and position level matches what has been assigned to specific projects.

Q. SDR-OM-34 Please identify the amount of postretirement benefits expenses under SFAS No. 106 which were recorded in the historical test year and are projected for the future test year. Please identify the total amount and the portion charged to O&M. Explain how the future test year expense was projected.

A. SDR-OM-34 Refer to Attachment SDR-OM-34(a) for postretirement benefit expenses in 2020, 2021, and 2022. The future test year postretirement benefit expense is based on an actuarial study performed by Willis Towers Watson.

PECO Energy

Postretirement Benefits Other than Pension ASC 715 (formerly SFAS No. 106) Costs

(in thousands)

	For the years ended December 31,		
	2020 Historical Test Year	2021 Future Test Year	2022 Fully Projected Future Test Year
Total Postretirement Benefit Other than Pension Costs	\$ (2,194) A	\$ 642 A	\$ 3,471 A
Operating & Maintenance			
Electric Distribution	\$ (929) B	\$ 245 B	\$ 1,553 B
Electric Transmission	\$ (111)	\$ 29	\$ 72
Gas	\$ (277)	\$ 86	\$ 248
Non-Utility		1	7
Total Operating & Maintenance	<u>\$ (1,317)</u>	<u>\$ 361</u>	<u>\$ 1,880</u>
Total Capital	\$ (877)	\$ 281	\$ 1,591
Total Company Activity - Operating & Maintenance and Capital	<u>\$ (2,194)</u>	<u>\$ 642</u>	<u>\$ 3,471</u>
Total Company Costs per Towers Watson	\$ (2,194)	\$ 642	\$ 3,471
<i>Variance</i>	\$ 0	\$ 0	\$ (0)

A - The OPEB costs are based on actuarial studies done by Towers Watson for PECO**B** - The above costs were allocated based on PECO's labor profile.

Q. SDR-OM-35 Please provide a copy of the Company's most recent SFAS No. 106 actuarial report.

A. SDR-OM-35 Refer to Confidential Attachment SDR-OM-21(a), which has been redacted to remove certain information that is not applicable to PECO.

**CONFIDENTIAL ATTACHMENT SDR-OM-21(a) CONTAINS
CONFIDENTIAL INFORMATION THAT IS PROVIDED ONLY
TO THE COMMISSION IN THE NON-PUBLIC VERSION OF THE
FILING.**

Q. SDR-OM-36 Please reconcile the historical and future test year Accounting Standards Codification (ASC) 715 (formerly SFAS No. 106) postretirement benefits other than pension expense levels with the amount identified in the actuarial report.

A. SDR-OM-36 Refer to Attachment SDR-OM-34(a).

Q. SDR-OM-37 Please identify the actual or projected amounts contributed to Accounting Standards Codification (ASC) 715 (formerly SFAS No. 106) postretirement benefits other than pension funds for the historic and future test years. Identify the actual or projected dates and amounts of the contributions.

A. SDR-OM-37 Refer to Attachment SDR-OM-37(a) for total Company contributions.

PECO Energy
Postretirement Benefits Other than Pension ASC 715 (formerly SFAS No. 106) Contributions
(in thousands)

	For the Years Ended December 31,		
	2020 Actuals	2021 Projected	2022 Projected
Total Company OPEB Contributions	\$ -	\$ 447	\$ 3,472

Q. SDR-OM-38 Please explain the funding options or plans which are being used for SFAS No. 106 costs. Identify the portion of the costs which are eligible for tax preferred funding.

A. SDR-OM-38 The two VEBA trusts used to fund post-retirement benefits are the Medical/Dental VEBA and the Life Insurance VEBA. The Life Insurance VEBA is used to pay life insurance benefits and the Medical/Dental VEBA is used to pay medical and dental benefits.

Q. SDR-OM-39 Is the Company studying and/or anticipating any changes to its postretirement benefits offered to employees as a result of SFAS No. 106 or for other reasons? If yes, please provide such study and/or explain the anticipated change.

A. SDR-OM-39 The Company amended the plan as stated in PECO Statement No. 2 – Direct Testimony of Robert J. Stefani, response to Question 10, beginning on line 13. No additional changes are being considered by senior management at this time.

Q. SDR-OM-40 Identify the total revenues for the year in which bad debt write-offs for the preceding three calendar years are associated. If the Company relates bad debts to other than total sales to ultimate customers, please specify what revenues are utilized.

A. SDR-OM-40 See below for Total Revenues for 2018-2020 (in \$000s):

Type	2018	2019	2020
PECO Billings ¹	2,279,681	2,174,401	2,299,984
Supplier Billings (EGS) ²	1,139,825	1,055,417	955,730
Total	3,419,506	3,229,818	3,255,714

¹. Represents amounts billed by PECO for distribution service and default service

². Represents amounts billed by PECO on behalf of Electric Generation Suppliers (EGS)

Q. SDR-OM-41 Provide the following information, for the future test year and the three previous years, by customer class:

- a. Total gross write-offs of uncollectible accounts.
- b. Total recoveries of uncollectible accounts.
- c. Net write-offs of uncollectible accounts.
- d. Total revenues.

A. SDR-OM-41 Please refer to Attachment SDR-OM-41(a).

2022 Charge-Off Analysis (Excluding Late Payment Charges)

	Gross Write Offs	Recoveries	Net Write Offs	Billed Revenue PECO & Supplier
<u>Residential</u>				
Residential	61,031,314	17,713,786	43,317,528	2,190,119,850
InPA*	7,491,524	908,235	6,583,289	
<u>Commercial</u>				
SC&I	3,322,754	764,351	2,558,403	751,794,134
LC&I	1,357,169	186,253	1,170,917	576,065,597
<u>Other</u>				
Street Lighting	10,449	-	10,449	26,017,208
Not Specified	-	-	-	-
Total of Rate Schedules	73,213,211	19,572,625	53,640,585	3,543,996,789

*The amounts relate to the in-program arrearage forgiveness program (Docket No. M-2012-2290911). All associated billings are included within residential billings.

2021 Charge-Off Analysis (Excluding Late Payment Charges)

	Gross Write Offs	Recoveries	Net Write Offs	Billed Revenue PECO & Supplier
<u>Residential</u>				
Residential	61,737,190	15,038,018	46,699,171	2,059,388,619
InPA*	7,578,170	771,041	6,807,128	
<u>Commercial</u>				
SC&I	3,361,184	648,891	2,712,293	706,918,520
LC&I	1,372,866	158,118	1,214,748	541,679,458
<u>Other</u>				
Street Lighting	10,570	-	10,570	24,464,205
Not Specified	-	-	-	-
Total of Rate Schedules	74,059,980	16,616,069	57,443,910	3,332,450,803

*The amounts relate to the in-program arrearage forgiveness program (Docket No. M-2012-2290911). All associated billings are included within residential billings.

2020 Charge-Off Analysis (Excluding Late Payment Charges)

	Gross Write Offs	Recoveries	Net Write Offs	Billed Revenue PECO & Supplier
<u>Residential</u>				
Residential	24,807,572	12,529,306	12,278,265	2,046,548,214
InPA*	2,629,274	615,265	2,014,009	
<u>Commercial</u>				
SC&I	1,844,777	772,594	1,072,183	654,304,647
LC&I	695,937	81,005	614,932	521,988,602
<u>Other</u>				
Street Lighting	5,751	-	5,751	24,961,302
Not Specified	-			
Total of Rate Schedules	29,983,310	13,998,170	15,985,140	3,247,802,765

*The amounts relate to the in-program arrearage forgiveness program (Docket No. M-2012-2290911). All associated billings are included within residential billings.

2019 Charge-Off Analysis (Excluding Late Payment Charges)

	Gross Write Offs	Recoveries	Net Write Offs	Billed Revenue PECO & Supplier
<u>Residential</u>				
Residential	39,208,223	14,016,027	25,192,196	1,976,299,836
InPA*	4,313,896	800,159	3,513,737	
<u>Commercial</u>				
SC&I	2,047,272	381,360	1,665,912	701,805,238
LC&I	1,203,496	227,636	975,860	520,571,540
<u>Other</u>				
Street Lighting	2,686	-	2,686	23,703,932
Not Specified	-			
Total of Rate Schedules	46,775,574	15,425,182	31,350,392	3,222,380,546

*The amounts relate to the in-program arrearage forgiveness program (Docket No. M-2012-2290911). All associated billings are included within residential billings.

2018 Charge-Off Analysis (Excluding Late Payment Charges)

	Gross Write Offs	Recoveries	Net Write Offs	Billed Revenue PECO & Supplier
<u>Residential</u>				
Residential	38,580,808	12,804,477	25,776,332	2,082,424,419
InPA*	5,869,007	609,520	5,259,487	
<u>Commercial</u>				
SC&I	1,425,434	523,215	902,219	740,675,921
LC&I	308,176	112,449	195,727	564,081,135
<u>Other</u>				
Street Lighting	8,266	-	8,266	23,815,540
Not Specified	-			
Total of Rate Schedules	46,191,691	14,049,661	32,142,030	3,410,997,016

*The amounts relate to the in-program arrearage forgiveness program (Docket No. M-2012-2290911). All associated billings are included within residential billings.

Q. SDR-OM-42 Please provide a comparison of the actual and budgeted vegetation control/tree trimming costs for the preceding two calendar years. Explain any variance in excess of 10%.

A. SDR-OM-42

<u>Year</u>	<u>Budget</u>	<u>Actual</u>	<u>Variance</u>	<u>Variance %</u>
2019	47,504,496	44,167,571	3,336,925	7%
2020	51,475,833	52,150,191	(674,358)	-1%

Q. SDR-OM-43 Please identify the budgeted level of tree trimming costs for the FTY.

A. SDR-OM-43

	<u>Budget</u>
2021	48,689,796
2022	49,994,521

Q. SDR-OM-44 Please provide all workpapers and supporting documentation, to the extent not otherwise provided, for the adjustments to rate base and operating income reflected in the Company's filing.

A. SDR-OM-44 Refer to Exhibit MJT-1, Exhibit MJT-2, Exhibit MJT-3, and PECO Statement No. 3, the direct testimony of Michael J. Trzaska.